

## ***Macro-Appraisal and Duplication of Information: Federal Real Property Management Records***

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### ***Résumé***

Cet article propose une méthodologie d'évaluation archivistique de documents similaires créés par des institutions différentes et qui documentent une activité commune. Un survol des méthodes et théories de macro-évaluation archivistique, lesquelles reposent sur l'analyse des fonctions et des structures institutionnelles servant à identifier les priorités d'acquisition, constitue la première partie de cet article. Une telle analyse des différents groupes, séries, systèmes, et créateurs de documents doit précéder l'évaluation des documents. L'argumentation centrale de cet article vise à démontrer comment une analyse d'une fonction pan-gouvernementale générant des documents similaires peut aider les archivistes à déterminer la valeur archivistique de ces documents. La présente étude porte sur les documents créés par la gestion des biens immobiliers du gouvernement fédéral canadien.

### ***Abstract***

This article explores a methodology to deal with front-end appraisal and backlog reduction of large volumes of similar records held by different creating institutions. The first section also briefly explores some recent developments in the theory and methodology of macro-appraisal, specifically the relationship between analyses that are focused on function and those that are focused on structure and their relative merits on the targeting of archival priorities. Such targeting among many groups, series, systems, and creators of records must occur before individual series, files, or items are actually appraised. The bulk of the article demonstrates how an analysis of a pan-institutional function that generates like records can help archivists better determine the (relative) archival value of such records. The case in point is the Government of Canada real property management records.

### ***Introduction***

Two constants in today's archival world for the government records archivist are shrinking resources and the ongoing, seemingly exponential increase in the volume of information created by government institutions. Every year, vast amounts of textual, architectural, and electronic records on the general topic of land management, and building construction and maintenance are being created in most Canadian federal institutions through about seventy distinct programmes.<sup>1</sup> Of those records, many have archival value and are being channelled to the National Archives of Canada through different transfer agreements with various federal institutions. The uncoordinated transfers of records has led to duplication of information held at the National Archives, with much more duplication anticipated as more transfer agreements are acted upon. In an era of space and resource constraints we ought to study this phenomenon.<sup>2</sup> Can we afford to maintain archival records that contain the same information or that document the same project within a broad function carried out by different departments? This problem of potential duplication becomes even greater if we accept the postulate that every duplicated record acquired by the National Archives will some day prevent a more unique record from being integrated into our holdings.

The purpose of this article is, first, to analyze the multi-institutional real property management function and look at the interactions among (and between) institutional structures that are carrying out this function as part of their mandates; and, second, to examine the records-creating processes that document this function. This approach should identify where activities and records likely overlap, leading to the formulation of a macro-appraisal hypothesis that assesses the relative importance (or "value") of each of the many institutions involved in this function and of the records they create. That hypothesis would then require validation through an analysis of the actual records. The article describes potential duplication of real property management records that already form part of the National Archives' backlog, analyzes current transfer agreements that allow for the ongoing acquisition of more such duplicated records, and tests recent theories suggesting how such haphazard and wasteful appraisal activities of the past may be avoided.

### ***Theory and Practice***

Archival theorists and strategists have made various contributions to the discussion on appraisal of institutional records. While each theory and methodology has its merits, the relative strengths and weaknesses of many if not all of them should be evaluated in particular appraisal situations.

In the last few years the scope of archival appraisal has expanded from focusing essentially on the record—what Gerald Ham has labelled the "taxonomic"<sup>3</sup> stage, concerned solely with systematization of values applied to records—to a more global, holistic strategy that focuses more on the macro-analysis of activities or functions in society.<sup>4</sup> This broad contextual approach takes into account the "information explosion," which has forced archivists to look at new ways of dealing with

very large amounts of records created by increasingly complex bureaucracies. In the case study before us, the overlap of responsibilities among several institutions has resulted in the operations of a function being documented more than once across government.

If as archivists we are concerned with addressing potential duplication of the archival record and, at the same time, if we are concerned with retracing “patterns of knowledge”<sup>5</sup> in the mass of documentation through an analysis of broader societal values, we ought to address the new archival context of information explosion and answer Hans Booms’s plea: “... it remains for the archivist to determine which documents, regardless of their provenance, possess the optimum concentration of desired information so that a maximum of documentation is achieved with a minimum of documents.”<sup>6</sup>

Hans Booms has also drawn attention to the notion of value, implying that it may be found “beyond” the record: “Measuring the societal significance of past facts by analyzing the value which their contemporaries attached to them should serve as foundation for all archival efforts towards forming the documentary heritage.”<sup>7</sup>

Similarly, Terry Eastwood, without specifically outlining a strategy or methodology, writes that “archives, as social creations ... [should] be appraised on the basis of an analysis of the use to which they are put by the society that created them.”<sup>8</sup> Eastwood would have archivists conduct an analysis of the “genesis of use” to which documents are subjected throughout their lifespan. It seems likely that this approach would involve a macro-analysis of records creators as well as contemporary users of records, in order that intelligible comparisons of “use” amongst many creators may be determined.

Terry Cook asserts that values in the first instance are found not in records, “but rather in theories of value of societal significance which archivists bring to the records.”<sup>9</sup> This theoretical stance is manifested in a matrix approach to appraisal, which looks primarily at the identification and setting of priorities amongst competing societal values through an analysis of functions, structures, clients (citizens), records creators, and records-creating processes, and—most important—their interaction. This model has been applied to federal government institutions in four phases or steps: first, putting institutions in order of functional priority; second, analyzing the internal functions of those structures; third, identifying those records creators that are performing the most “important” functions and activities within the structures; and finally, analyzing the records, which serves as a process of validation of the earlier research and macro-appraisal hypothesis.<sup>10</sup>

Macro-appraisals of government records performed at the National Archives, according to a component of Cook’s appraisal methodology, have so far focused primarily on a functional analysis within structures.<sup>11</sup> A second phase of that methodology, however, is to document broad government functions horizontally through analyses of programmes carried out generically across various institutions and through analyses of patterns of completed appraisals. Undertaking this process will help us to understand fully the creation of records emanating from similar functions, and the sharing of common functions amongst various institutions.<sup>12</sup>

In the United States, the Institutional Functional Analysis (IFA) developed by Helen Samuels involves a functional analysis of similar institutions to “contextual-

ize appraisal.” Her strategy purposely withdraws the focus from the structure to allow an understanding of functions and activities first. The purpose of the institutional functional analysis is to achieve an understanding of institutions with similar mandates; it is an archival targeting tool intended to address today’s complex interactions between functions and structures, in order to finally get at the records themselves.<sup>13</sup>

From a brief examination of these recent appraisal theories and strategies, which are complementary rather than antagonistic, we can extrapolate that archivists are being encouraged to tackle the mass of society’s documentation, first, by conducting macro-analysis to identify structures or functions (or both) that would likely contain the best archival record and, second, by applying thereafter more conventional approaches or criteria to look at the records and determine their archival value based on informational, evidential, and legal considerations.

### *Case Study and Potential Solutions*

Macro-analysis of the real property management programme in the Government of Canada provides very good guidelines, which help to refine archival value judgments that otherwise would be very difficult to make by the traditional approach of appraising records in isolation. This case study of federal real property management records came about when it was realized that a functional analysis of the structure of the Department of Public Works and Government Services (PWC)<sup>14</sup> was, in practice, impossible because its functions could not be divorced from the real property management programme across the entire Government of Canada. Too many of its activities are shared with other departments. Therefore, to arrive at an evaluation of the functions performed at PWC, one must first look at global management of the programme. If such an approach is not undertaken, records documenting real property management activities will continue to be appraised in isolation; those defined as archival will be acquired from each individual department or agency, again in isolation, and there will be no way to prevent the acquisition of duplicate records.

In the course of defining archival priorities for PWC, one cannot limit the research scope to the question “what does PWC do?” The issue is rather “how is the real property management programme managed in the Federal Government and what role is played by PWC and by the records creating processes in this programme or function?” The approach focuses on the broad function and not on the structure. It is designed, first, to define how federal departments share the responsibility in carrying out operations related to real property management and, second, to describe patterns of information within structures that carry out such tasks. This step of course is crucial in the process of identifying potential archival duplication. In essence, we examine the function horizontally across government before we look at the structures, which are organized vertically and within which records are created.

### a) The Real Property Management Programme

The real property management programme as a whole has been revised many times in the last thirty years. This has been due to a lack of control by the government over the function, which is one of the most politicized of government because of its high cost, its role in job creation, and its patronage possibilities. There have been two attempts to re-orient federal real property management. In the early sixties, the Royal Commission on Government Organization (the Glassco Commission) recommended that centralization of the real property management programme (including design and construction) rest with Public Works Canada (PWC).<sup>15</sup> While attempts were later made to transfer some land management tasks to PWC, generally the recommendation was never carried out and the function remained decentralized. Later, in 1986, the Nielsen Task Force on programme review assessed real property management and recommended a streamlining of that programme. The changes included: empowering Treasury Board to act as a central policy and regulating body for real property management, limiting PWC in its land management activities, empowering individual departments in management of real property, and centralizing all activities concerning architecture and engineering in PWC.<sup>16</sup> Here again, only some of the recommendations were adopted. The main recommendations of these reviews, however, often served as a basis for a series of policies concerning real property management.

In 1986, when the Nielsen review was conducted, the real property management function was performed through approximately seventy-four programmes administered by all departments, represented between \$40 and \$60 billion in Crown assets, and employed more than 17,000 people.<sup>17</sup>

The central policy and regulatory agencies in this field are the Bureau of Real Property Management of the Treasury Board and Public Works Canada (PWC), which together set the government-wide policy and regulations in matters dealing with real property management. In addition, PWC is responsible for management of land, engineering, and architectural services, as well as maintenance and repairs of properties not under the legislation of other departments. An agency must have a specific enabling real property management clause in its legislation and mandate in order to perform real property management activities without the consent of PWC. For example, Parks Canada, Transport Canada, and National Defence all have jurisdiction in matters relating to land because of their supporting legislation. In 1986, there were forty acts granting different departments the right to manage land and perform engineering and architectural activities.<sup>18</sup>

Three types of activities are to be distinguished in analyzing the real property management function: *property management*, which includes all matters dealing with appraisal, acquisition, disposal of land, and expropriations; *engineering and architecture services*, which consist of all technical support provided for construction of buildings and facilities; and *accommodations services*, which include maintenance and repair of those buildings and facilities.

These activities are performed through three types of programmes: *common services*, i.e., management of assets in supporting other programmes (for example, PWC providing engineering and architectural or real property management services to other departments); *direct programme delivery*, including the management

of real property management as an integral part of delivery of services to the public, such as ports, airports, museums, etc.; and *property development*, which includes real property management projects intended to fulfil the broad socio-economic objective to generate employment in various regions of Canada.<sup>19</sup>

In practice PWC provides real property management and architectural and engineering services to those departments that do not have jurisdiction in the field of real property management (such as the Departments of Justice and Finance, or the National Archives). However, PWC also provides services for departments who *do* have jurisdiction but have decided not to exercise it in some areas. Despite the fact that the *Transport Act* contains a real property management clause, Transport Canada has left some control of those operations to PWC since 1972. Other institutions such as Agriculture Canada, Indian and Northern Affairs, Parks Canada, and the RCMP keep the real property management component for themselves, but leave engineering and architectural services to PWC. To add to the confusion, new policies now encourage departments to get involved in the planning stage of any construction project and to work jointly with PWC on projects.

In its application of property management, PWC acts as a “landlord” in granting land, buildings, and accommodations to the departments that do not have such jurisdiction; these departments are “tenants” subject to reviews. In the field of engineering and architecture, PWC acts as a “consultant,” in providing those services to the departments that require them. Increasingly, however, responsibility for land management has been delegated back to individual departments from PWC, which then acts as an “auditor” or “overseer.”<sup>20</sup>

## **b) Records-Creating Processes**

Analysis of the records-creating processes in the above functions will help to identify where duplication of information occurs. In fact, we can identify three categories of records that document the real property management function. First, for land management, there are policy and inventory records intended to control the programme (and process). The second category comprises legal records such as land leases and deeds related to land. Third, we can identify records concerning actual land management, that is, appraisal, acquisition, and disposal of land or buildings. For the engineering and architectural services, there are specific project or site files, and consultant or contractor files. These records are often supported by collections of plans and specifications separate from the project files themselves.

Most departments document real property management in various ways in their records classification systems. PWC manages several operational systems of information in all media concerning its three real property management activities. Records systems for PWC are, therefore, divided among engineering and architectural services, real property services, and maintenance and repairs.<sup>21</sup> Electronic systems are divided along similar lines: electronic plans and specifications databases are managed by Engineering and Architectural Services Branch, while the Federal Government Inventory of Real Property Management is the responsibility of the Real Property Management Branch.<sup>22</sup>

In a nutshell, PWC and a few other departments use operational, not administrative, file blocks to organize their information, because of the centrality of the real property management function to their mandates. The Department of Agriculture, having a legislated jurisdiction in matters dealing with real property management, uses an operational file block for property management, another for buildings, and a third for accommodation, maintenance, and repairs. The Department of Indian and Northern Affairs uses a similar system with the exception of native land, which is a topic covered under another operational file block.<sup>23</sup> A variation to this pattern is the Department of Transport, which uses operational file blocks for real property management within its programmes concerning transportation, air, land, rail, and marine.<sup>24</sup>

Most departments, however, treat real property management files as administrative records, organized in accordance with Schedule Two of the *General Records Disposal Schedules* (GRDS), which separates the information into three fields of activity: land management, engineering and architectural services, and accommodation.<sup>25</sup> Of course, appraisal and disposition criteria under the administrative GRDS are quite distinct from similar criteria for individual operational records disposition schedules or authorities.

### **c) Duplication of Information Versus Duplication of the Archival Record**

There seem to be three reasons for the duplication of information across institutions and the consequent duplication of the archival record: the multi-institutional nature of the function, the existence of separate transfer agreements between the NA and the federal institutions that create real property management records, and the way in which archival value has been defined for such records.

Duplication of information occurs at different levels within the institutions responsible for the real property management function. For example, the central agencies dealing with real property management, such as PWC, Treasury Board, and the Department of Justice, all create aggregated information used to develop and administer policies. Such records as legal texts and administrative budget approval files are duplicated among these central agencies. The most important source of potential duplication, however exists in the records of operations of the real property management function, such as when a department uses PWC services for a construction project or land management. In such cases both departments are likely to generate information that is very similar, if not duplicated exactly. For example, if a department requests from PWC the acquisition of a new building, or purchase of land, it will prepare documentation that will end up in an appropriate administrative file. The project will then be approved by Treasury Board and PWC, which will also generate records. Throughout the project, both the client department and PWC will create similar information, exchange it, and file it. This pattern is not a problem when non-archival records are involved. However, how do we deal with records of archival value? Front-end appraisal performed without knowledge that the real property management function involves several partners may lead to appraisal decisions, made by different archivists perhaps several years apart, that will not take into account all the overlapping functions and activities and will thus result in the transfer of duplicate information from these institutions to archival holdings.

Most schedules or records disposition authorities addressing real property management records, such as Schedule Two of the *General Records Disposal Schedules*, are filters through which the archives acquires records having legal, evidential, and informational value. The problem occurs when similar records created in separate structures to document an identical activity are also appraised in relative isolation by various archivists at different times. There is no formal mechanism in place to alert the archives as to when potential duplication of the real property management archival record may occur.<sup>26</sup> When an activity is documented in two or more structural environments and several sets of records are judged independently to be archival, careful contextual study must be made of which set of records should be kept, or whether both should be maintained, in part if not in whole, given restraints on archival space and resources and indeed the desire not to burden researchers with unnecessary records and description. These are the questions that challenge archivists today. For instance, an operational records transfer agreement with the Department of Indian and Northern Affairs<sup>27</sup> requires the transfer to the National Archives of all buildings and lands files. The Department of Agriculture has a similar agreement<sup>28</sup> calling for the transfer of all construction files to the National Archives. A third agreement with PWC provides for the transfer of all legal land files and all construction project files.<sup>29</sup> For most departments, however, land files are disposed of through a common administrative authority for real property management (Schedule Two of the *General Records Disposal Schedules*),<sup>30</sup> which is organized by record type. This schedule, which most departments apply, states that legal files and construction files should also be subjected to an archival appraisal by the National Archives.

These examples of transfer agreements show that in situations where an activity is documented in two or more structural environments, it is likely that similar records from several sources will be judged archival, according to archival values based on the record type, and all of them will form part of the archival holdings.

Traditionally, federal government real property management records have been defined as archival mostly for their legal value.<sup>31</sup> Records such as contracts, deeds, and leases have been maintained to document evidence of ownership of land throughout Canada. In addition, plans, drawings, and specifications supporting the real property management function have been maintained for evidence of spending, security reasons, accountability, and continuity of administration. Records on older buildings have also been maintained to document the evolution of architecture and engineering. In such cases, records were maintained for the information they contained rather than to document the evidence of a business transaction. In fact, such archival real property management records are currently being researched for reasons beyond their original purpose of creation. For example, such records as right-of-way files, which were originally created to document ownership and use of land, are now being used to document activities such as environmental or native claims.<sup>32</sup>

The duplication of the archival record can already be seen in the current holdings of the National Archives. A search conducted through the Government Archives Division's electronic finding aid located 13,000 construction and land files for Indian and Northern Affairs, 1,700 such files in the records of Agriculture Canada,



200 in Foreign Affairs, and 900 in those of the RCMP.<sup>33</sup> Approximately forty-five per cent of those project files are documented in the records of PWC; this proportion will increase in future as more records make their way to the National Archives through current transfer agreements.

To take another, more specific example, a file-by-file analysis of a recent RCMP acquisition revealed many building construction files acquired for their legal, evidential, aesthetic, and architectural values. All of these buildings, however, were built by PWC; the related PWC records are also in the National Archives holdings.<sup>34</sup> In fact, in this RCMP accession, over sixty-five per cent of the records contain information that is duplicated in the records of PWC.

#### **d) Hypothesis or Suggested Guidelines for Application**

The analysis of the real property management function permits a macro-appraisal hypothesis to make better archival appraisal decisions and to minimize duplication of the archival record. All policy files concerning real property management emerge from either PWC or Treasury Board. Conversely, if another department generates policy on the use of land or construction in general, it seems fairly certain that the same information will exist in the same form in either PWC or Treasury Board. Legal and financial records concerning real property management found at Treasury Board or the Department of Justice will contain the same financial and legal information, albeit in aggregated or summarized form, as is found in each individual project or site file. However, these records are created to provide the very narrow flow of information needed to approve or deny a project and its financing; they generally contain very limited information on the project itself.

Project or site files, conversely, provide information on entire projects, including the external input from pressure groups and politicians. As projects always involve more than one department, project records are generated in more than one place. The real archival challenge is to select amongst various project files those that best document the project. The first question to ask is: who is in charge of (or accountable for) the project? Most real property management issues involve one department in the role of land owner and another acting as a service contractor. The "land owner" agency usually leads the project and creates complete files because of its legal and financial accountability. The analysis of the function shows a very steady trend in that direction: more and more responsibility for land management is being given to individual departments while engineering and architectural services across government departments are being centralized in PWC. If that trend is valid, then archival decisions on real property records would determine that sites files be acquired by individual departments rather than by central agencies. Conversely, project construction files should not be acquired from individual client departments but rather from a central agency, in this case PWC.

The following macro-appraisal hypothesis thus emerges: if a department does not have a legislative mandate for real property management, PWC is likely to have the complete file. A related hypothesis is that traditional generic appraisal criteria ("legal value," etc.) cannot necessarily be applied universally to similar records; instead, the context of the function/mandate and the context of the record and its creator must be analyzed first in each particular case.

As an example, the archival records of PWC contain twenty metres of files created by Transport Canada, which had been copied and transferred to PWC. Among these records are original leases for various National Parks lands.<sup>35</sup> In this case, one set of these records exists for each of Transport Canada, Parks Canada, and PWC. Using traditional appraisal criteria of legal and continuing administrative value, all three sets could form part of the National Archives holdings. Should all three sets be kept? In this particular case, Transport Canada originally had the mandate to perform the appraisal of land; this responsibility was later transferred to PWC, which then completed the work. It might be most appropriate to retain the Parks Canada files (if that would be possible) rather than those from PWC or Transport Canada, because Parks has its own real property management jurisdiction and PWC was only performing its task as a second-degree consultant.

This hypothesis remains to be confirmed using methodologies that look at the actual records—to ensure that the nature of the records matches the conclusions of the macro-appraisal functional analysis. The function of real property management as a whole must be studied before actual records are examined; only then can such approaches as the use of diplomatics<sup>36</sup> and hermeneutics<sup>37</sup>—validation of authenticity by analysis of record structure and form, and looking for context by the “narrative reading” of text—be considered seriously.

### ***Conclusion***

This paper has shown how an extension of the National Archives new macro-appraisal functional approach can be used to analyze the creation of real property management records from a multi-institutional perspective. It has demonstrated that the understanding of how the real property management function is carried out in federal institutions identifies duplication in the records-creating process as well as in the archival holdings. This broader understanding permits the formulation of a hypothesis to minimize the impact of duplication of information for archives.

Such macro-appraisal analysis performed here could also be applied to other shared multi-institutional government functions, such as protection of the environment, regional development, or law enforcement. Such an approach would probably enhance the new strategy put in place by the National Archives to acquire the best government records in an age where it is becoming more and more difficult to do so.

### Notes

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- 1 Canada, *Management of Government: Real Property, A Study Team Report to the Task Force on Program Review* (Ottawa, 1986), pp. 13-15.
- 2 On the "post-custodial era" see Gerald Ham, "The Archival Edge," in Maygene F. Daniels and Timothy Walch, eds., *A Modern Archives Reader* (Washington, 1984), pp. 318-340. The word "duplication" in this paper refers to activities that are documented twice or more through the records creating processes in separate structural environments. It refers to "duplication of information," or "activity," or "function," not necessarily of records, unless stated otherwise.
- 3 *Ibid.*, pp. 328-329.
- 4 For a summary of archival theories and methodologies see Terry Cook, "Mind Over Matter: Towards a New Theory of Archival Appraisal," in Barbara L. Craig, ed., *The Archival Imagination: Essays in Honour of Hugh A. Taylor* (Ottawa, 1992), pp. 40-46.
- 5 Hugh Taylor, "Towards the New Archivist: The Integrated Professional," as quoted in Terry Cook, "Mind Over Matter," p. 43.
- 6 Hans Booms, "Society and the Formation of a Documentary Heritage: Issues in the Appraisal of Archival Sources," *Archivaria* 24 (Summer 1987), p. 105.
- 7 *Ibid.*, p. 104.
- 8 Terry Eastwood, "Towards a Social Theory of Appraisal," in *The Archival Imagination*, p. 83. Despite these assertions, Terry Eastwood later distances himself from Booms and clarifies his comments regarding use. See Terry Eastwood, "How Goes It With Appraisal?" *Archivaria* 36 (Autumn 1993), pp. 115-120.
- 9 Terry Cook, "Mind Over Matter," p. 41.
- 10 National Archives, *Government-Wide Plan for the Disposition of Records 1991-1996*, internal document (approved by the National Archivist on 20 November 1990). Terry Cook was the author of this report.
- 11 Terry Cook, "Mind Over Matter," pp. 53-56. Also, for a full description of the new approach to the appraisal and acquisition of federal government records see Bruce Wilson, "Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada," *Archivaria* 34 (Fall 1994), pp. 218-231.
- 12 See *Government-Wide Plan for the Disposition of Records*, Part 7, pp. 15-16.
- 13 Helen Willa Samuels, *Varsity Letters: Documenting Modern Colleges and Universities* (Metuchen, N.J. and London, 1992), pp. 3-7. Such an analysis is however difficult to undertake in practice because of the difficulty of finding the tools to perform the analysis. According to Margaret Hedstrom, such analysis involves leaving the structures and resorting to a higher level of understanding by undertaking broad research and consulting commissions, reports, audits, reports of lobby groups, etc. See Margaret Hedstrom, "New Appraisal Techniques: The Effect of Theory on Practice," *Provenance* 7, no. 2 (Fall 1989), p. 11.
- 14 The former Department of Public Works (or Public Works Canada) was amalgamated with whole departments and parts of other departments in 1993 to form Public Works and Government Services Canada. For the purposes of this paper, the acronyms PWC will be used to refer to that Canadian federal Department.
- 15 See *The Royal Commission on Government Organisation: Supporting Services for Government 2* (Ottawa, 1962), p. 35.
- 16 For a concise review of the real property programme see Canada, *Management of Government: Real Property, A Study Team Report to the Task Force on Program Review* (Ottawa, 1986).
- 17 *Ibid.*, pp. 13-16.
- 18 *Ibid.*, pp. 83-86. Similarly, PWGSC also is responsible for the application of portions of other acts such as the *Bridges Act* and the *Trans-Canada Highway Act*.
- 19 *Ibid.*, pp. 1-2.
- 20 *Ibid.*, pp. 128-131.
- 21 See Public Works Canada, *Records Classification Plan* (1979) or National Archives of Canada, Authority 1979/002, file 6240-50/S5-79/002.
- 22 Also to be noted, this inventory is also used by the Real Property Branch of the Treasury Board.
- 23 For more details, consult National Archives of Canada, Authority 76/009, file 6240-50/J1-76/009 and TB604856, file 6241-50/A1-604856.

- 24 For more detail see Transport Canada Authorities, National Archives of Canada, Authority 83/004, file 6241-50/T5-83/004, Authority 80/029, file 6240-50/T5-80/029, Authority 77/018, file 6240-50/T5-77/018, Authority 77/003, file 6240-50/T5-77/003, Authority 76/006, file 6240-50/T5-76/006.
- 25 Public Archives of Canada, *General Records Disposal Schedules of the Government of Canada*, 4th ed. (1986), Schedule II.
- 26 This is not to say that archivists do not talk to each other but, rather, to highlight the problem of “stove pipe” appraisal, that is, appraisal by structure first. Archivists also certainly possess what Hans Booms has referred to as “*Versehen*,” or “intuitive understanding,” which we use in addition to formal mechanisms when appraising records.
- 27 National Archives of Canada, Authority 76/009, file 6240-50/J1-76/009.
- 28 National Archives of Canada, *Treasury Board Submission* TB604856, file 6241-50/A1-604856.
- 29 National Archives of Canada, Authority 79/009, file 6240-50/E3-79/009.
- 30 *General Records Disposal Schedules*, Schedule II.
- 31 *Ibid.*
- 32 To follow up on Eastwood’s point, uses for records change by the creator accordingly and bring a measure of “value” to the archival spectrum for consideration. Environmental audits and land claims (both native and non-native) bring new users to real property records which were not originally created to be used by such clientele.
- 33 These figures were gathered by using MINISIS, an electronic finding aid to government records in the Government Archives Division.
- 34 NA, Records of the Royal Canadian Mounted Police, RG 18, vols. 4620-4646.
- 35 NA, Records of the Department of Public Works, RG 11, accession 1984-85/065, boxes 1-33.
- 36 Luciana Duranti, “Diplomatics: New Uses for an Old Science (Part I),” *Archivaria* 28 (Summer 1989), pp. 7-27. The diplomatic method of analysis also focuses attention on the procedural context of records creation by identifying each phase of an administrative procedure as well as by categorizing procedures in relation to the purpose they serve in an administrative context. It thus provides a coherent and meaningful framework in which to analyse actions and appraise the records that embody them.
- 37 Richard Brown, “Records Acquisition Strategy and Its Theoretical Foundation: The Case for a Concept of Archival Hermeneutics,” *Archivaria* 33 (Winter 1991-1992), pp. 34-56.