Counterpoint

Putting the Parts of the Whole Together: Systematic Arrangement of Archives[*]

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RÉSUMÉ   L'objectif de cet article est de déterminer les principes qui peuvent être utilisés afin de développer une approche standardisée pour servir au classement des documents d'archives. L'auteur y propose un certain nombre de règles pour identifier les différents regroupements de documents dont découlent les structures externe et interne d'un fonds. Il examine également les différences entre les approches de classement basées sur le concept du fonds ou sur celui de la série. La conclusion de l'article est que, contrairement à l'idée couramment acceptée, ce n'est pas notre mauvaise compréhension de l'arrangement des documents qui entrave leur contrôle intellectuel, mais plutôt la difficulté de développer des systèmes capables de communiquer l'information au sujet de la complexité des regroupements de documents d'archives et de leurs relations entre eux.

ABSTRACT   This article aims to characterize the principled rules that can be used to develop a standard approach to arrangement of archives. It proposes a number of rules for identification of the various aggregations of records that form the external and internal structure of a fonds. It also examines the differences between the approaches to arrangement of systems based on the concept of the fonds and on series control. It concludes that, contrary to a commonly held opinion, it is not our understanding of the terms of arrangement that impedes intellectual control of archives, but rather the difficulties in developing systems capable of communicating information about the complex of aggregations forming an archives and their relationships.

Archival arrangement is essentially a process of identifying relationships, not a process of physically ordering and storing documents. The choice of the word "arrangement" as the name of this process is unfortunate. It denotes placing things in proper, desired, or convenient order, as in arranging books on a shelf. The word classification is no more satisfactory, for it denotes arranging or ordering things by class and is a term better reserved in archival science for the process of organizing active records. By contrast, the essence

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[*] The word "archives" is taken here to mean the whole of the documents made and received by a juridical or physical person or organization in the conduct of affairs, and preserved. It is synonymous with the term "fonds."

of archival arrangement is the identification of the natural accumulations of archival documents or records which take shape during the process of their generation.[1] (For now, until we discuss the various kinds of accumulations, let us refer to them as aggregations.) Identification precedes and, to a very great extent, determines description. Yet, there is some question about whether the various identifications determined during arrangement can be systematized or standardized. This article analyses just what is at issue in the continuing discourse about arrangement. It argues that it is vital to understand the differing nature of the various kinds of aggregations in order to identify them properly and specify their relationships.

   Recently, discussion of application of the concept of the fonds has occupied centre stage. Chris Hurley speaks of the Australian reluctance "to be drawn into that great archival grail quest – The Search for the Holy Fonds." He goes on to argue that "even when a fonds is defined (assuming one definition will do), the real quest remains – finding which attributes and relationships to document (and how) so that it will materialise for us."[2] Beyond enunciating the principle of provenance and deciding on levels of description for fonds, series, file, and item, the Canadian *Rules for Archival Description* (*RAD*) is silent about arrangement, however intimately the rules are implicitly related.[3] As Bob Krawczyk puts it in an article condemning the concept of the fonds as being unworkable in practice, "we are applying exacting descriptive standards to records that are frequently arranged according to no standards at all."[4] Indeed, the concern about what constitutes a fonds and the enthusiastic advocacy of a system of series control suggests that, for all that has been written about arrangement and description, some things remain disturbingly unsettled. What are they? Can they in fact be settled? Can we arrive at universally acceptable principles to guide systematic identification of aggregations and their relationships that can be applied anytime, anywhere?

The Urgent Need

Standardizing arrangement is vital to the implementation of the networks of databases describing archival holdings envisaged as the wave of the future.

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1 The terms "archival document(s)" and "record(s)" may be taken as synonyms.
2 C. Hurley, "The Australian ('Series') System: An Exposition," in Sue McKemmish and Michael Piggott, eds., *The Records Continuum: Ian MacLean and Australian Archives First Fifty Years* (Clayton, 1994), p. 169.
3 Bureau of Canadian Archivists, Planning Committee on Descriptive Standards, *Rules for Archival Description* (Ottawa, 1990–96). On pages xiii–xvi, the chairperson of the committee, Kent Haworth, discusses the axioms on which the rules were based.
4 Bob Krawczyk, "Cross Reference Heaven: The Abandonment of the Fonds as the Primary Level of Arrangement for Ontario Government Records," *Archivaria* 48 (Fall 1999), p. 132.

As Terry Cook observes, inconsistencies in the arrangement of archives "when reflected in national networks of archival description could be extremely misleading to researchers."[5] This is so because a systematic scheme of archival arrangement is fundamental to administrative control and intellectual control, which together provide the foundation for effective retrieval of and intellectual access to archival documents.

Administrative control is the means of physically organizing the holdings of records centres and archival institutions through numbers and lists. My focus here, however, is on intellectual control, or administrative control only as it concerns intellectual control. Intellectual control is the means of documenting the provenance, arrangement, scope, composition, content, and external and internal relationships of archival material.[6] Understanding the difference between external and internal relationships is vital to effective identification of archival material. Much of the confusion in discussions of arrangement comes from the failure to see the difference between the relationships of external structure and internal structure. Previously, I distinguished them in this way.

There are two aspects to the structure of archival fonds. On the one hand, archival documents are systematized according to the way their agent of provenance organizes or structures its activities. This external structure of provenance identifies and explains the various administrative relationships governing the way organizations and persons conduct their business, which in turn governs the way they create and maintain their archives. On the other hand, every archival fonds also has a documentary structure established by the way the documents are ordered during the conduct of affairs. This internal structure of provenance identifies the relationships among the documents as they were organized by the agent accumulating them.[7]

The most difficult problem of arrangement is to come to some agreement about the terms to use in analysing external structure. Large modern bureaucracies, particularly those of governments, but also those of other organizations, like churches, universities, and business firms, have complex and ever-

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5 Terry Cook, "The Concept of the Archival Fonds: Theory, Description, and Provenance in the Post-Custodial Era," in Terry Eastwood, ed., *The Archival Fonds: From Theory to Practice/Le fonds d'archives : de la théorie à la pratique* (Ottawa, 1992), p. 58.

6 In Lewis J. Bellardo and Lynn Lady Bellardo, comps., *A Glossary for Archivists, Manuscript Curators, and Records Managers* (Chicago, 1992), administrative control is characterized as "the use of documentation to manage holdings ... without reference to the information they hold." By contrast, intellectual control is "the acquisition and creation of documentation required to access the informational content of records." The definitions given here are offered as more explicit acknowledgement of the nature of the two activities.

7 Terry Eastwood, *The Archival Fonds*, p. 4.

changing administrative or organizational structures. Finding a solution to this problem becomes urgent if we are going to present a coherent picture of the relationships among the records created in complex and ever-changing bureaucratic structures. And, as Cook observed, we have to come up with a solution archivists can actually use to produce consistent identifications and coherent descriptive systems, whether within a single repository or across many.

Conceiving Rules of Arrangement

What, then, must a standard approach to arrangement address? Most aspects of the problem are well known, but, despite extensive writings on the subject, there is a lack of agreement on their resolution. Part of the reason is that the various writers tend, to greater or lesser degree, to defend or explain a particular practice. So, Holmes and Vincent explain the application of the record group system in the national archives of the United States and Canada respectively. Muller, Feith, and Fruin interpret the concept of the fonds (*archief* in Dutch) in their national setting, as do Jenkinson and Duchein. Scott and his colleagues explain the series system as it evolved in Australia's national archives.[8] What follows attempts to break the general problem of arrangement down into its principal component problems, and to arrive at principled statements to guide institutional policy. For the sake of convenience, I call these principled statements rules. Of course, any principles of identification will have to be interpreted in institutional policy, but the aim of this article is to ensure that policies will not differ in practice in any manner that will compromise efforts to achieve the goal of comprehensive and comprehensible description of archival holdings.[9]

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8 Oliver W. Holmes, "Archival Arrangement – Five Different Operations at Five Different Levels," *American Archivist* 27 (January 1964), pp. 21–41; Carl Vincent, "The Record Group – A Concept in Evolution," *Archivaria* 3 (Winter 1976–77), pp. 3–15; S. Muller, J.A. Feith, and R. Fruin, *Manual for the Arrangement and Description of Archives*, Arthur H. Leavitt, trans. (New York, 1940); Hilary Jenkinson, *A Manual of Archive Administration* (London, 1965); Michel Duchein, "Theoretical Principles and Practical Problems of *Respect des fonds* in Archival Science," *Archivaria* 16 (Summer 1983), pp. 64–82; P.J Scott, et. al., "Archives and Administrative Change: Some Methods and Approaches," published in five parts in *Archives and Manuscripts* 7 (August 1978), pp. 115–27; 7 (April 1979), pp. 151–65; 8 (June 1980), pp. 41–53; 8 (December 1980), pp. 51–69; and 9 (September 1981), pp. 3–18.

9 Hurley, "Australian ('Series') System," p. 159 takes a different view of the role of rules from that taken here. He says "it will be seen, then, that the conceptual model [of the series system] itself imposes no hard and fast 'rules' about how descriptive entities are defined and related. This must be worked out in the rule base devised for each application." If rules in this context are taken to mean principled statements used to guide the identifications made during arrangement, there is no reason why they need be "hard and fast," that is inflexible. It is also perhaps misleading to speak of defining and relating "descriptive entities." It is not the needs of archival control and description that dictate what entities need to be identified, but, rather, it

The Problem of Dealing with Accruals

Early writers on arrangement assumed that archivists were treating closed fonds of some long dead creating entity. Today, closed fonds, though they may be common enough in the archives of individuals and defunct organizations, are the exception rather than the rule. Archival institutions regularly receive accessions containing records accruing to holdings of one or more existing natural grouping, for example, to the records of a particular office or a particular series. As Mark Wagland and Russell Kelly clearly indicate, it was at least in part the problem of accruals that caused the Commonwealth Archives Office in Australia to adopt a system of series control. It is also one of the factors Krawczyk advances for the decision of the Archives of Ontario to adopt a series system. Prior to the adoption of the series system, administrative control by numbering and listing each accession made it difficult to gain a coherent picture of a series "spread across a number of accessions" without an elaborate and cumbersome method of cross-referencing to locate the parts of the series.[10] This problem is unavoidable in an environment where the parts of the whole are received piecemeal. However, the solution does not lie in building arrangement on administrative control of accessions, which produces intellectual control wedded to principles of physical control and fails altogether to solve the problem of identifying records with the grouping to which they belong. (All contemporary writers agree on this matter.) The answer lies elsewhere. Whatever the disagreement in interpreting the concept of the fonds, the need to separate physical and administrative control from intellectual control is incontestable. Therefore, the first rule of arrangement is *separate physical and administrative control from intellectual control*.

Each accession is an addition to the holdings of a repository and may be made up of one or more components. It may constitute the first receipt of records of one or more aggregations, receipt of a single accrual to an established aggregation, multiple accruals to already established aggregations, or some other combination. Therefore, the second rule of arrangement, closely related to the first, is to *identify each component of an accession with the aggregation or aggregations to which it belongs*.[11] Storage and listing of

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is argued here, it is questions of the way organizations structure themselves and form their records into aggregations that are at issue. In fact, almost all of the writing on the Australian series system has been about the identification of archives, not about developing rules for description, which is why I make so much reference to Australian writers.

10 Mark Wagland and Russell Kelly, "The Series System – A Revolution in Archival Control," in *The Records Continuum*, p. 133.

11 Each component will normally be identified with one aggregation. The exception is for so-called multiple-provenance series, which are discussed below.

records usually accompanies this initial process of identification. At the National Archives of Australia, each component of an accession is called a consignment. A consignment is defined as "a part of a series requiring partic-ular disposal action or having a particular storage requirement or otherwise needing to be distinguished from the rest of the series [for control pur-poses]."[12] This allows records to be stored as convenience dictates, while facilitating physical retrieval. The heart of the matter lies, of course, in decid-ing how accessions belong to aggregations, which means rules need to be established to facilitate systematic identification upon which effective descrip-tion can be built.

Identifying Relationships of External and Internal Structure

The process of identifying records with the aggregations to which they belong is complicated by problems stemming from the effects of administrative change on the structure of organizations and on record-keeping. Since the last century, archivists have recognized, as the Dutch *Manual* put it, that "if the functions of the [creating] body change, the nature of the archival collection [*archief*] changes likewise."[13] The principle that records follow functions is called by Scott the principle of "'functional sovereignty' over records, in that a department becomes responsible for the records documenting a function allocated to it."[14] What is new is the rate of administrative change. Functions or, more properly, functional responsibilities as expressed in mandates and competences[15] are altered, augmented, or shifted about in the administrative structure with increasing regularity. New administrative divisions of one kind or another come and go, mushroom and wither. Activities proliferate and with them accumulations of records. Tracking this change in all its complexity seems often to be beyond the capacity of originating administrative agencies themselves, let alone archivists who must later understand and document it, but doing just that is one of the central concerns of archival management. The work in the 1960s and 1970s in building the Australian system of control

12 Wagland and Kelly, "The Series System," p. 140.
13 Muller, Feith, and Fruin, *Manual*, p. 6.
14 Scott, "Archives and Administrative Change," Part 2, p. 151.
15 I say this to make it clear that it is the actual administrative facts of the matter, and not classification for the purpose of creating vocabularies of function, that is at issue. Chris Hurley, "What, If Anything, is a Function?" *Archives and Manuscripts* 21, no. 2, pp. 208–20 discusses the scientific and linguistic difficulties of determining what a function is for the purposes of classification and description of archives. Lewis J. Bellardo and Lynn Lady Bellardo, comps., *A Glossary for Archivists, Manuscript Curators, and Records Managers* (Chicago, 1992) defines competence as "the sphere of responsibility entrusted to a given office or person." It defines mandate as "the authority vested in an agency," and adds that "a mandate is fulfilled by means of functions."

resulted in a more cogent characterization of the complications of arrangement caused by administrative change than had hitherto been available. These complications are examined below.

If the process of gaining administrative control of the components of accessions is to identify them with the aggregation to which they belong, several questions arise. How do records come to form aggregations? In what kinds of natural aggregations (that is, of the records creator's making) do records accumulate?[16] What are the underlying principles? These questions get at the heart of the distinction between series- and fonds-based systems of identification, and give rise to three related questions. What is an agency? What is a record-keeping system? And, what is a series?

First Complication: Identifying Agencies

The Australian system posits that there are essentially three levels at which records form aggregations. If we take them from the top down, they are the *record-keeping system, series,* and *item*. The first, the record-keeping system, has never been defined, and in fact it is not an entity of either administrative/physical or intellectual control in the Australian system. Rather, it emerges as an element within the definition of agency. Scott defines an agency as "a part of an organization, at any level of the administrative hierarchy, which has (or had) its own independent general record-keeping system (or, if a Board, etc., its own separate system of minutes or proceedings) and its own distinctive and generally consistent basic name or title over a given period of years."[17] The National Archives of Australia defines an agency as "an administrative unit that is a recognizable entity, generates records and has its own independent general record-keeping system."[18] Hurley characterizes the problem of defining agency in the following terms.

There is room for debate over what constitutes a records-creating entity (agency). Are the separate branches of a government department to be treated as records creating

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16 It hardly seems necessary to spell out that the principle of provenance associates records with their creator or creating entity, that is, the entity that made or received them in the (we can say, natural) course of its activities. On this score, Scott, "Archives and Administrative Change," Part 3, p. 45 says: "While all three concepts, 'creating', 'transferring' and 'controlling', have valid connotations and applications to archival work, it remains our view that, for basic arrangement, description and reference, the 'creating' agency is pre-eminent." Quite so. It is important to know which entity transferred the records and which controls "withdrawal and use" of them, if different from the creator, but these are facts of custody, access, and so on, which, though they may have effects which complicate identification, do not determine provenance.

17 Scott, "Part 3," pp. 50–51.

18 Wagland and Kelly, "The Series System," p. 140.

agencies in their own right or as component divisions of a parent agency? Long experience of applying the system has taught us that there is no satisfactory answer to the question posed in that way. It will depend on a number of variables which alter cases – chiefly whether the "sub-agencies" had their own history, what administrative structures join each with its parent(s), and what kind of records each kept.[19]

For Hurley, an agency is a "records-creating entity" that has its own record-keeping system distinguishable from any other record-keeping system. The determinative criterion for identifying an agency is the nature of record-keeping. He leaves it to local rules to set criteria for identifying agencies because, he says, "common sense tells us that there is much we don't know about how the system must be adapted if it is to be applied to different experiences of human activity." Different situations, he continues, "will require substantial modifications to the precise rules that have so far been developed [in Australia]" in order to adapt "[their] application to other record keeping environments."[20] Given that the arrival of the Australian system on the international scene was trumpeted as an "abandonment" of the record group system,[21] it is curious that its flexible notion of agency echoes an important facet of the record group system. The committee at the National Archives of the United States that devised the record group concept in the 1940s defined the record group as "a major archival unit established somewhat arbitrarily with due regard for provenance and to the desirability of making the unit of convenient size and character for the work of arrangement and description and for the publication of inventories."[22] The Australian interpretation of record-keeping system – and its determinative role in identifying agency – is surprisingly similar to the American term "archival unit." This similarity reflects the fact that both the record group system and the series system aim to provide administrative and intellectual control rather than present a principled view of arrangement that is applicable anywhere.

The concept of the fonds, by contrast, rests on a definition of agency that is derived far more closely from the manner in which agencies are established. This is essentially the position Duchein takes. In Duchein's view,

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19 Hurley, "Australian 'Series' System," p. 161.

20 Ibid., pp. 161–62.

21 P.J. Scott, "The Record Group Concept: The Case for Abandonment," *American Archivist* 29 (October 1966), pp. 493–504. Hurley says: "I suspect that Peter Scott came to regret the use of the word 'abandonment' in his seminal 1966 article. He sometimes spoke wistfully of how we had not lost the *fonds*, as critics supposed, but recreated it 'on paper', using our Inventories and other products of the system." Hurley, "Australian 'Series' System," p. 165.

22 Mario D. Fenyo, "The Record Group Concept: A Critique," *American Archivist* 29 (April 1966), p. 233, quoting Section 4 of Memorandum A-142 (28 February 1941) that announced the new policy.

agency and *fonds-creating entity* are synonymous. He sets out five criteria for defining an agency. First of all, it "must possess its own name and [juridical] existence proclaimed in a dated act (law, edict, decree, or other instrument.)" Second, it "must possess precise and stable powers defined by a text having legal or regulatory status." Third, "its position in the line of authority of the administrative hierarchy must be exactly defined by the act which brought it into being; in particular, its subordination to an agency at a higher level must be clearly stated." Fourth, "it must have a responsible head, possessing the power of decision to his hierarchical level." And, finally, "its internal organization must as far as possible be known and regulated by an organizational chart."[23]

Scott disagrees. After reviewing Duchein's criteria, he says, "Duchein is in our view insisting on a rather formal basis for agency definition – too formal for quite a number of nonetheless real agencies – and making it too dependent on administrative status rather than on record-keeping."[24] Much of the Australian criticism appears to be that Duchein, in setting out criteria as he does, makes the definition too dependent on the manner in which agencies are established in a particular juridical and organizational context for any useful application. There are simply too many differences in the ways agencies are actually established from juridical system to juridical system.

There is some truth to the criticism. For instance, agencies established by private organizations, such as an industrial corporation, a bank, or a religious organization, are not normally created as explained in Duchein's first two criteria. Moreover, many entities that would appear to be agencies according to Duchein's criteria do not behave as agencies in their record-keeping practices. Scott cites the example of the former Office of the Parliamentary Counsel of the Australian national government, which, he says, meets all of Duchein's criteria. Yet, because its files were maintained in the general registry system of the Department of the Attorney-General, it had no independent record-keeping system and so could hardly be an agency in the practical sense of the Australian definition.[25] Scott's anomalous example makes the exception the reason for abandoning the effort to sustain a principled view of what constitutes an agency. It is the contention here that just such a principled view is required. Concerns over such anomalies tend to obscure certain fundamental concepts and principles that can be usefully employed to standardize analysis and identifications. It is precisely these concepts and principles that the Australian approach lacks. They are connected with and derive from the way organizations, both public and private, behave, regardless of the juridical system.

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23 Duchein, "Theoretical Principles," p. 70.
24 Scott, "Archives and Administrative Change," Part 3, p. 50.
25 Ibid., pp. 48 and 50.

A principled view of what constitutes an agency requires an understanding of the delegation of authority in organizations. As Jane Parkinson puts it, "the delegation of authority and resources for the purpose of accomplishing actions is fundamental to organized social life and forms the basis for the administration of affairs."[26] For any organization, whether public or private, to accomplish its affairs, it must delegate responsibilities in a determined sphere of activity to agents of one kind or another. Most modern juridical systems have well-developed legal mechanisms or rules to deal with the question of who is responsible for what. In the broadest sense, the concept of delegation or agency refers to the relationship that exists when one person acts for or represents another by the latter's authority. We connect our notions of accountability to the networks of delegations of authority that exist within organizations. Governments and many other organizations have formal procedures for appointing their agents. An agency in the public sphere is an agent of the sovereign authority. So, too, are each of the offices or officers of an agency, and so is Scott's Office of Parliamentary Counsel, even though it may be deprived of its own distinct record-keeping system.

In order to deal with the complexities inherent in the delegation of authority, Duchein proposes that we adopt "a new notion ... of a *hierarchy of fonds* corresponding to the hierarchy of creating agencies, involving the subordination of certain *fonds* in relation to others."[27] In principle, Scott agrees with Duchein that such a notion is useful in characterizing the whereabouts and status of agencies within the structure of government,[28] but then takes a different direction. In effect, the Australian system deals with the twin problems of identifying agencies and accounting for administrative change by concentrating primarily on documenting relationships – those established through time by delegations of authority. It avoids the question of what constitutes an agency qua agency in principled terms. Instead, it homes in on those administrative entities that have their own record-keeping system, then concentrates on their interconnections with other entities. It treats the position or status of each "administrative entity" not as something connected with establishing what constitutes a fonds or fonds-creating entity but rather *as a matter of identifying and recording information about the relationships between the various administrative entities of an organization.* If, for example, several divisions or regional offices, constituting administrative entities within a large department of government, create distinct record-keeping systems, this

26 Jane Parkinson, "Accountability in Archival Science" (M.A.S. Thesis, University of British Columbia, 1993), p. 13. As a footnote to the sentence quoted, the author cites the O.E.D. definition of the verb "delegate": "to commit [authority, powers, etc.] to agent."
27 Duchein, "Theoretical Principles," p. 71.
28 Scott, "Archives and Administrative Change," Part 3, p. 48.

justifies their identification as agencies. The description of each agency, identified in this manner, documents the precise relationship it has with its superior body. Changes in the relationship are also documented. So, for instance, if a division is moved from one department to another, this fact is recorded in the history of the division. Hurley argues that this method, when married to series control, provides a complete picture of the network of relationships within larger entities like government departments. According to Hurley,

Some critics of the system suppose (wrongly) that the attributes of the larger "lost" entities, ones which aggregate characteristics of both records and provenance, are dispensed with. The answer to such critics is that those attributes are not lost; they are preserved most lovingly at the very heart of the system. We call them relationships.[29]

He goes on to say that recording these relationships and how and when they change "enables complex and detailed statements about recordkeeping and context to be (re)constructed."[30]

Nonetheless, there are further complexities that this approach must accommodate. It is necessary to distinguish between statements characterizing relationships of delegation of authority, or authority relations, and statements describing an entity's sphere of functional responsibility. The concept of authority relations is common in social theory. As sociologist James S. Coleman puts it,

... social action does not consist merely of transactions among independent individuals within a competitive, or market, context. Individuals often act under another's authority. ... Social structure involves organizations and groups of people which engage in activities as entities: nations, families, associations, clubs, and unions. These entities, viewed from the outside, may be regarded as actors no less than individuals are. Nevertheless, viewed from the inside, they may be characterized as authority structures. ... One actor has authority over another in some domain of action when the first holds the right to direct the actions of the second in that domain. ... An authority relation of one actor over another exists when the first has rights of control over certain actions of the other.[31]

Many entities in modern bureaucracies have clearly defined mandates laying out their authority to administer affairs in a defined sphere. For instance, this is the case for boards and commissions in modern governments.

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29 Hurley, "Australian ('Series') System," p. 162.
30 Ibid., p. 163.
31 James S. Coleman, *Foundations of Social Theory* (Cambridge, MA, 1990), pp. 66–67.

In order to effect constitutional, administrative, and fiscal accountability,[32] they report or are in some other manner subordinate to a ministry or department, perhaps several over time, but do not carry out responsibilities derived directly from that ministry's or department's mandate. These entities are clearly different from divisions and regional offices of a ministry or department. They derive their competence from the mandate of the ministry or department. This distinction (of context) is vital, because the relationships between entities connected solely for the purposes of accountability and entities carrying out a part of the same mandate are different in kind. It is with this distinction in mind that Duchein says:

Any ministry or institute office certainly creates archives which are, at the time of creation, distinct from those of other offices of the same ministry or the same institute, but the various archives are closely interdependent and can no more be considered autonomous than can the office itself.[33]

The notion of what constitutes an entity's fonds is, then, closely tied to the notion of the functional sovereignty over records. Both Krawczyk and Scott discuss examples illustrating the complexity of identifying aggregations of records with functional sovereignty.

Krawczyk argues that determining what he calls the official mandate of agencies is problematical in the Government of Ontario. He says that "even the largest agencies within the government may fail to meet [Duchein's] criteria."[34] He then gives the example of the merging in 1993 of the Ministry of the Solicitor General and the Ministry of Correctional Services, both established by an act of the Ontario legislature, to form the Ministry of the Solicitor General and Correctional Services. The instrument bringing the merger into effect was an Order-in-Council, which "simply appointed a member of the Executive Council as Solicitor General and Minister of Correctional Services."[35] When the portfolio of the minister was divided in 1999, separate ministers for the two agencies were appointed again. The mandate of the Solicitor General, on the one hand, and of Correctional Services, on the

32 Parkinson, "Accountability in Archival Science," pp. 7–8, usefully distinguishes the various meanings of a concept she says is shrouded in "ambiguity and confusion." In constitutional law, accountability refers to "the conventions and procedures that govern the relations between people and their representatives, representatives and their delegates." In public administration, it means "systems for efficient, effective, responsive, and responsible decision-making." In accounting, it has come to refer to "provision of [fiscal] information for decision-making rather than for stewardship."
33 Duchein, "Theoretical Principles," p. 70.
34 Krawczyk, "Cross Reference Heaven," p. 136.
35 Ibid., p. 151, n. 16.

other, remained unchanged, and the records produced in the sphere of each have a functional unity. It is in fact this unity, that is, all of the records of the successive bodies responsible for the mandate, that needs to be identified and its characteristics communicated to researchers. The fact that authority relations changed is merely a contextual fact to be recorded, not a reason for saying two identifiable fonds do not exist before, in the period between, and after the changes in 1993 and 1999.

Scott's example of the Office of Parliamentary Counsel also illustrates the issue very well. The *mandate* of the office was established in an instrument (from what Scott says, in its own special act) separate from the act or acts (in fact, most modern ministries or departments are responsible for administering many acts) establishing the *mandate* of the attorney-general's department, which, presumably for efficiency's sake, happened to provide record-keeping services to the office. The whole of the records of the office, wherever they may be found, constitute its fonds, even if some or all of its records are intermingled in some way with those of another entity. Notably, the same can be said for records of a defunct entity that are intermingled (by refiling, for instance) with those of a successor, which has assumed its functions. All one can say is that the records of the predecessor have "disappeared" as a separate, easily identifiable, *physical* body of records when they acquired their new administrative and documentary context. Equally, of course, one has to identify them (though perhaps, in the circumstances, not in much detail) as having come under the custody and control of the successor, which then further generates records in pursuit of its newly acquired functional responsibilities. It is clear, then, that defining agency in terms of record-keeping system, even with careful recording of the contextual relationships, rather muddies the waters. Both Scott and Hurley argue that the output or products of a descriptive database built on identification of entities and attributes will generate descriptions of fonds. It is doubtful that it will for the researcher, who may find Krawczyk's "cross reference heaven" to be a nightmare. This may become more evident when we examine problems associated with the definition of record-keeping system and series in the Australian system of control. But before we do that, we need to summarize the rules that can be derived from this discussion of what constitutes an agency.

The first rule is that *the archives of an organization is in essence constituted by a hierarchy of fonds*. This rule expresses the concept that the characteristics of the organization and its mission or reason for being present the "maximalist" perspective on the fonds. The second rule is that *agencies are fonds-creating bodies*. The third rule is that *an agency is an entity having its own mandate established through the constitutive procedure of **the organization** to which it belongs*. Determining what constitutes an agency, then, depends on identifying the type of procedure **the organization** uses to establish its constituent administrative entities. Nowadays, governments, for in-

stance, use formal instruments like laws or regulations, although other organizations may use far less formal means to delegate authority and resources. For instance, the Government of Canada has established the National Archives of Canada through legislation (its procedure for establishing agencies) as the agency to carry out its archival function. Of course, strictly speaking, this agency as such does not create records. This is so because, in the act establishing the National Archives (NA), its only designated officer is the National Archivist, who is empowered to appoint other officers, assign them their competence or sphere of functional responsibility, and organize them into administrative arms, which we may generally call offices. It is these officers and offices that, according to their competence, actually generate records. The act also makes the NA and the National Archivist subject to the authority of a minister (a member of the Queen's privy council.) Over its entire history, the National Archives of Canada (from 1912 to 1987 called the Public Archives of Canada) has been subject to the authority of several different ministers. This does not mean that the records created by the various officers and offices of the NA are part of the fonds of the several ministries for which the minister to whom the National Archivist reported was also responsible. Rather, its functional sovereignty deriving from its mandate stated in an act of parliament means that it creates its own fonds – and simply enjoys variable authority relations with the minister and ministry to which it was subordinate.

Second Complication: Identifying Offices

Agencies are not the only level at which we must look. In much smaller and simpler organizations – smaller than a national, provincial, or municipal government – there may be no agencies, only offices and officers (sometimes only the latter) acting as its agents. For instance, the constitution of the incorporated body known as the Association of Canadian Archivists (ACA) establishes certain of its agents, such as its executive officers and standing committees, and the executive is empowered to establish other agents, such as the ACA's ad hoc committees. The fact that, from a practical standpoint, it is easier to comprehend and singularly describe the ACA's archives than the archives of the Government of Canada does not mean that the principle in question works in some circumstances and not in others. Remember that the traditional definition of fonds speaks of it as being "the whole of the records of a juridical or physical person." Organizations and their constituent agencies, officers, and offices are all juridical persons, each having its own archives. Therefore, some notion of archives within archives is essential from both conceptual and practical perspectives.

This means we have to distinguish an agency from an office. The difference is that *an office is an entity having its own competence established through the constitutive procedure of the **agency** to which it belongs*. This

rule embodies the essential criteria of autonomy about which Duchein speaks. Of course, even within their mandates, agencies might have to seek approval to establish new divisions and secure their funding, because they are subject to some higher authority. In fact, the French word "fonds" also means funds. We might, as the National Archives of Canada does, tie our definition of fonds to entities having a significant measure of control over their finances, but this criterion often fails to coincide with any reasonable view of the functional autonomy of agencies. An agency may have its own act and mandate and be part of the larger structure of one or a succession of departments over time, such as has been the case of the Geological Survey of Canada throughout the course of its history. The Geological Survey's budget is determined and many of its administrative functions carried out by offices of the larger department to which it belongs, but the Geological Survey was not established by that department. Rather it was established by an act of parliament, which is the most common constitutive means for establishing agencies of the Government of Canada. The fonds of such large umbrella-like departments are very complex, largely because they both contain branches or divisions that act as agencies with functional sovereignty over their records (at least their substantive or operational records) and offices administering one or another of the acts for which the department is responsible. Offices and agencies of this kind often move about in the organization. Political, fiscal, territorial, or other considerations, rather than rational considerations of functional sovereignty, often dictate the rhythms and results of change. For instance, the need to keep departments or ministries to a minimum (either to keep the cabinet at a workable number or ward off criticism of "a bloated government") has often created bizarre combinations of functional responsibilities within the bosom of contemporary Canadian departments or ministries.

If it is relatively easy to see that an entity such as the Geological Survey of Canada creates its own fonds, it is, as Krawczyk perceives, less easy to apply the concept of the fonds to subordinate offices of a ministry. Sometimes entities begin life as offices in a department or ministry and are subsequently moved to another department. Krawczyk rests his case against applying the concept of the fonds in arrangement on one such entity, "the subordinate offices and branches that have been responsible for oversight of the library system in Ontario," which for convenience we shall call "the libraries office."[36] The libraries office derived its authority from the authority for culture invested in its superior ministry. At different times, responsibility for culture was placed in a polyglot ministry also having other spheres of responsibility, such as recreation, citizenship, and tourism. Over time, the libraries office saw its position in the hierarchy change and the activities it carried out

36 Krawczyk, "Cross Reference Heaven," p. 137.

evolve, but its record-keeping remained stable, in line with its relatively stable sphere of functional responsibility. The gist of Krawczyk's argument is that the various series of records generated by the libraries office fall neither into the fonds of any one of the several ministries to which it belonged, nor into a separate fonds of its own. In the former case, he argues, its records would belong to the fonds of each of the ministries in which it was placed. In the latter case, its subordinate position disqualifies it in Duchein's terms from creating its own fonds. There is a simple solution to the problem, which is hardly so difficult to resolve as to necessitate dispensing with the concept of the fonds either in theory or practice. The fact is, the libraries office is an entity whose authority relations have changed over time. It is a subordinate body (an office in the terms I am using here) of several different superior bodies. The facts of its administrative context need to be identified as a vital part of identifying the relationships of its records with those of its superior bodies over time. In principle, then, its records do fit into the several fonds of the ministries of which it was a part. It is noteworthy that the records of the libraries office were never mixed with those of offices responsible for recreation, citizenship, or tourism that were part of ministries to which it successively belonged. Each of these ministries had responsibility for culture. Krawczyk does not explore the juridical foundation of the mandate for cultural affairs under which, presumably, the libraries office operated. In any event, the example of the libraries office nicely illustrates that the records of such offices do indeed belong in several different fonds, but also that they enjoy, derivatively, their own measure of functional sovereignty. To repeat, there is no need to identify records as having a single, immutable provenance, and this is so when deciding how to describe holdings. Sometimes Krawczyk's argument seems to imply that adherence to the concept of the fonds requires that records be identified and, presumably, described in one fonds and one fonds only. The concept of the fonds has always been an abstract concept, a theoretical construct of archival science. Its validity cannot be challenged on a purely physical basis. Seeing this and considering all the writings on the subject of the fonds and series, we must conceive of fonds divorced from the sense that records can be seen in one and only one context and documented only in that one way. Hurley's concept of larger entities "materializing" for us in multiple descriptions embodies the same insight. And so, indeed, does the adaptation of the series system developed in Ontario that Krawczyk describes.

In some cases, to be sure, it has been found useful to depart from a strict interpretation of the distinction between agency and office. For instance, Duchein enunciates a rule that "local branches dependent on a central agency create *fonds d'archives* which are their own." He utilizes the concept of hierarchy of fonds to cover this departure from the norm. A local or regional branch of an agency is in fact an office established by the agency. In identify-

ing fonds, departures from the norm to cover a particular class of office, such as regional branch offices, can be dealt with through the archival institution's policies. So, for example, under such a policy, the NA might treat as fonds the whole of the records of each regional office of the Department of Indian Affairs. It would then only be necessary to identify them as offices of the department and describe when they existed, the geographical and other ambit of their responsibilities, and so on. The rule here is to *ensure that departures from the rules governing the distinction between agencies and offices are made on a consistent basis in institutional policies*. There is, then, no need to quarrel over the degree of autonomy that makes an entity an agency.

Third Complication: Identifying Changes in Authority and Functional Relations

If the criteria inherent in the distinction between agencies "established by the constitutive procedures of the *organization*" and offices "established by the constitutive procedures of the *agency*" are justifiably interpreted, the outcome should provide the knowledge sufficient to implement two additional rules. *For every agency, identify the succession of superior agencies to which it was subject for purposes of accountability over time. For every agency, identify predecessors or successors that undertook all or part of its mandated functional responsibilities*. These identifications sort out the relationships of external structure necessary to understand the hierarchy of fonds of an organization.

Similar relationships exist for offices or officers that are transferred from one agency to another. Such offices or officers are subordinate bodies within the succession of agencies to which they belong. Often, the activities of such offices or officers grow to such a point that they are recognized as separate agencies and so duly constituted. This kind of occurrence was actually very common in earlier days of Canadian administration when some office or officer was established to carry out a new activity. And again, as mentioned earlier, constitutive procedures can vary. Such offices or officers were often established without an act setting out their functional responsibilities. Legislative sanction can often only be traced through such sources as public accounts, where mention of the financial allotment to the office or officer is made. For instance, in British Columbia, whose provincial archives to this day does not have an act, the first official sanction that established the archival function was a vote of funds by the legislature in the 1890s.[37] Similarly, the archival function in the federal government was first funded by a vote of

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37 Terry Eastwood, "R.E. Gosnell, E.O.S. Scholefield, and the Founding of the Provincial Archives of British Columbia," in Tom Nesmith, ed., *Canadian Archival Studies and the Rediscovery of Provenance* (Metuchen, N.J., & London, 1993), p. 114.

parliament in 1872, even though its first act dates from 1912.[38] From 1872 until 1912, the archival function was performed by an office in the Department of Agriculture, as part of the department's responsibility for arts and manufactures. The point is that no one today would quarrel with identifying the British Columbia Archives or the National Archives of Canada as agencies and naming the offices and officers which first carried out the archival function as their predecessors.

These facts of administrative history obviously need to be identified and documented, but they also must be related to the facts about record-keeping that arise out of the organization's history. Herein lies some of the great difficulty in comparing the notions underlying the Australian system of control with the concept of the fonds evolving in Canada as a result of the stimulus provided by the *Rules for Archival Description*. Most Australian writing has not gone much beyond characterizing the basic problems of identification, outlining the method of documenting agencies and series, and then averring, as Hurley does, that any notion of the fonds one might like to adopt will come out in the wash.[39] Those products are essentially a registration of agencies and series, and inventories of the various series of each agency, together with a system of linkages built on an analysis of relationships not unlike those outlined above. We must, then, examine the problem of identifying series, but not before first examining the question of what constitutes a record-keeping system.

Fourth Complication: Identifying Records with the Office That Created Them

What is the record-keeping system of which the Australians speak? At first blush, the answer to this question seems relatively straightforward, but it is in fact enormously complicated. Modern agencies of large organizations rarely have a single, centralized record-keeping system, such as the registry systems of former times. Instead, central and branch offices and, in some cases, individual officers keep their own records, whether or not according to a department-wide classification system. In this atmosphere of decentralized record-keeping, it is even more important than it was in the days of more centralized record-keeping to visualize fonds as a records system, that is, all of the records of an agency. It is vital to interpret fonds as the whole of the records of an *agency*, made up of the records of each of its constituent parts, which all pursue the agency's mandate. It is quite clear that you can never

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38 Ian Wilson, "A Noble Dream: The Origins of the Public Archives of Canada," in Tom Nesmith, ed., *Canadian Archival Studies*, p. 63.
39 Hurley, "Australian ('Series') System," p. 167.

arrive at a description of the whole of the records of most modern agencies of government without identifying, piece by piece (so to speak), the records belonging to their offices and officers. Because accessions and accruals arrive piecemeal, they must be identified with the office or officer that generated them. In practice, this process also initiates identification of the relationship between the office or officer and its parent or parents (if the office or officer is part of different agencies over time), as well its succession of functions, activities, or programmes.

More yet is needed. In Canadian terms, the records of subordinate offices of an agency are sometimes designated as being a sous-fonds or sub-group. However, the *Rules for Archival Description* do not make explicit provision for this level of description. The rules instead suggest implicitly that a fonds should be described as being made up of its constituent series, and that a description of series, cumulatively identified with all the offices of creation in the agency, will then allow a detailed picture of sous-fonds to emerge. The manner in which this works may be traced to the principle built into *RAD* rule 1.1B4a. This rule states that the creator of aggregations (which usually means series) must be named within the aggregation's title, in effect, placing it within the fonds. Notably, there is nothing to prevent archival institutions or programmes from developing more precise naming protocols on their own, but improved professional rules would be even better. In fact, our growing understanding of the complexities behind this aspect of identification has rarely been realized in descriptive systems, in particular, in their capacity to reflect the many different provenancial (external) and documentary (internal) relationships of a fonds.

The rule, then, to address this aspect of identification is *identify each office's relationships to its superior entity and its sphere of functional responsibility over time*. This latter step in identifying records' provenance – identifying the functions giving rise to them – is, as already explained, more closely associated with the actual circumstances surrounding the production of records than are the intricacies of identifying agencies, their individual mandates, and their relationships with one another. Hurley tries to make this distinction by describing agencies in the sense just used as "ambient entities" – entities without a simple, direct relationship between their sphere of functional responsibility and an identifiable body of records. Large entities such as government departments are made up of a complex of functions and programmes. Sometimes they are the administrative home to several agencies over time. When Hurley speaks of them as ambient entities, he means that they constitute a larger context that is mostly concerned with relationships of authority and accountability. But the entities actually responsible for the production of records are the various offices and officers *within* the agency that direct its affairs or carry out its functions. Communicating knowledge of complex archives of large and sprawling agencies like government depart-

ments (one kind of ambient entity) is no simple matter. It requires a precise and specific characterization of the parts of the whole by describing the salient facts of the history of agencies, offices, and officers, on the one hand, and the aggregations of records they create, on the other. The Canadian approach in *RAD* supposes that the researchers to whom this knowledge will be communicated will be served by linking description of provenance and of records within multi–level descriptions. These multi–level descriptions, to repeat, cannot be generated at one blow in the actual working world. They are necessarily added to and amended as new accruals are received and identified. Authority files play an important role in assisting researchers in navigating the complex databases containing multi–level description of many fonds.

There is a superficial similarity between authority control and the registration of agencies in the Australian fashion. In Canada, authority control is integral to the realization of *RAD*'s aim to make the connection between information about provenance and records explicit in multi–level description. It does so by ensuring consistency in the naming of agencies, offices, and the like. Similarly, the Australian register of agencies documents the same important facts of identification about which we have been speaking, but does so by emphasizing the *relationships* between agencies (which, you will remember, are also sufficiently flexible to encompass an actual agency, an office within an agency, or a branch office). Australians like Hurley assert that complete description will "materialize" only through this system of administrative and intellectual control, with its method of identifying series and agencies based on identification of relationships. Whichever approach is taken, any method of arrangement and description must have the capability to effect piecemeal work and yet result in descriptions of the parts of a whole and of their contexts that are comprehensible to researchers and searchable from the multiple points of view. One question remains. What is the role of series identification in the scheme of things?

Fifth Complication: Identifying Series

There is an archival adage that it is almost impossible to define what a series is, but "don't worry, you'll know when you see one." Such advice is scant comfort to those who would erect a system of archival control on the concept of series. The Australian National Archives defines a series as "a group of records that are recorded or maintained by the same agency (or agencies) and that are in the same numerical, alphabetical, chronological or other identifiable sequence; or result from the same accumulation or filing process and are of similar function, format or informational content." This definition is tantamount to saying that a series is a group of records organized on the basis of some established criteria or arranged in some identifiable sequence. Most other definitions of series are essentially the same. It is one thing "to see" a

series, but to identify it properly means identifying it with its immediate office of creation, and that office in its network of administrative relationships. Whatever the argument over the merits of fonds- and series-based systems of archival control, there is agreement on the need to identify series in this way. Interestingly, Hurley says that the most common application of the series system in Australia is to identify the immediate provenance of series by office without making any attempt to describe all the related series of an office collectively as a whole.[40] This is much the same thing as saying that there is no need to describe sous-fonds or sub-groups: they will emerge through description of their component series. The notion of a record-keeping system becomes, then, an umbrella-like term under which to group all of the series of an office. Take the example of the National Archives of Canada, arguably an agency. The office might be that of the National Archivist or an office assigned some sphere of the agency's operational or administrative functions, such as the Manuscript Division, or one of its local branches, such as one of its regional records centres. As already noted, the Australian notion of record-keeping system is not a descriptive entity, and therefore not an entity that needs to be identified as such. Neither is it in the Canadian way of thinking. *RAD* does not speak of the need to describe collectively all the series of an office. Description of series one by one, it is assumed, will result in a cumulative picture of them evolving. However, it seems to be an open question whether, as appears to be the case, some institutions will think of the series of a office being all of its sub-series, in which case series becomes an umbrella-like notion akin to that of the Australian notion of record-keeping system. The best that can be said is that this thorny problem of defining and identifying series is still open to a number of different interpretations.

In comparing the relative values of series- and fonds-based approaches, one of the most difficult problems lies with so-called multiple-provenance series or, as Wagland and Kelly characterize them, "variable-provenance" series. In principle, it is easy to characterize the problem. Agencies as such, to repeat, do not create records series: offices or officers within them do, according to their competence. Changes in the assignment of competence within organizations mean that certain spheres of functional responsibility move from office to office, either within the same agency or from one agency to another. In Scott's terms, such series have multiple provenance. But do they? In principle, each individual record generated by an office (leaving open, for the moment, whether individual records can be generated by more than one office) has only one provenance, that of the office that generated it. All the records generated by the office constitute its fonds within, if you like, the hierarchy of fonds. The principle that the record's functional role is sovereign dictates

40 Hurley, "The Australian ('Series') System," p. 160.

that the provenance of records lies always in the body or office that made or received the record in the course of carrying out its responsibilities. The fact that some or all of its series were taken over by another entity that was given all or part of its competence cannot change the fact that the first office, in its context, was the creator of these series for a period of time. Similarly, as successor, the second office in turn creates records of essentially the same functional character for a determined period of time – and so on as further transfers of competence occur. The effects on record-keeping of such changes often make it difficult to characterize precisely which records belong to which agency and/or office. Some of the most intricate problems of arrangement arise in this context, because it is often impossible to solve the problem through physical means and then refer to each physical body of records as belonging to one or another entity. Such so-called multiple-provenance series, virtually every authority agrees, need to be attributed to all their successive creators. The rule here is *identify series with their succession of creating offices.*

This problem is not really one of arrangement but, rather, one of description. It is the very problem that sparked the creation of the Australian system of control. Any assumption that a single body of functionally related records created by several different entities over time can or should be described as being part of only one record group, archive group, or fonds is unacceptable. A predecessor office should not be deprived of records it created; a successor should not have records ascribed to it that it did not create. The Australian system registers such multiple-provenance series by identifying the period of time during which each office generated parts of the series. The inventory of each agency's series shows the series that it had a hand in creating. The control lists and register of series can be used to retrieve individual series. Knowing the facts of series creation, researchers are still left, as they must be, to puzzle out the broader history of creation as they begin examining the records in whatever state they have come to rest. In the most difficult ones, as suggested earlier, the records of some predecessor may have "disappeared" into some successor's series or classification system. The researcher interested in the records of the predecessor has to be directed to look for them in the successor's records.

One additional question that might be asked in clarifying the difference between series- and fonds-based approaches is whether multi–level description of a fonds is essentially the same as an inventory of descriptions of an agency's series. *RAD* addresses the question of documenting predecessors and successors through requirements for administrative history and the question of multiple provenance by recourse to notes, but it does not do so as clearly as it might. Nor is it clear how the multiple listings characteristic of the Australian system can be effected in multi–level description. When this is connected with the problem of identifying the components of accessions with

the aggregations to which they belong, we can see why a system of series control is attractive. However, there is no avoiding a multiple-description solution to the problem. On this, too, all authorities agree. Duchein says that "the solution consists of reconstituting, thanks to finding aids [i.e., through description], the continuity of *suites* of documentation which were disturbed in the arrangement of the fonds because of changes of structure and jurisdiction relating to the agencies."[41] The Australian system tries to produce fonds-like description by generating a comprehensive listing of all the series produced by an agency. Series registrations document the links to the various agencies having, over time, a hand in producing individual series.

Conclusion

What, then, can be concluded from the foregoing discussion? I think we can conclude that there is, in fact, surprising little disagreement over what has to be identified in the process of arrangement. The principle difference between the fonds-based concept and the Australian series system lies in the approach the two take to the definition of agencies. The former holds fast to the notion that an agency is the highest level entity in an organization expressing functional sovereignty in the creation of archives as a whole, and therefore circumscribes the most important archival relationships. The Australians prefer a more elastic concept of agency based on pragmatic assessment of this same principle. They want multiple views of the provenance of records of an organization to emerge through documenting changes in the entities which actually create records (functional sovereignty), on the one hand, and changes in the relationship of those entities in the chain of command established by the delegation of authority (authority relations), on the other. Whether repositories opt for one conceptual approach or the other, the acid test is to realize their full potential. Problems of arrangement no longer need hold us back. There is still some work to elaborate rules of description in order to ensure that the information necessary for correctly identifying archives is gathered and communicated intelligibly to researchers. There is even more work to build institutional systems capable of revealing the rich tapestry of archival relationships.

Yet more work is needed to ensure that inter-institutional databases such as those contemplated for CAIN are adequately designed. In this respect, it would be a tragedy if the choice is between description of either series or fonds. That is a Hobson's choice. As things stand, archivists rarely have the capacity or opportunity to translate these complicated ideas underpinning arrangement into reality, whether in the series-system mode or by applying

41 Duchein, "Theoretical Principles," p. 81.

the concept of the fonds. In many places, they are still being asked to describe physical groupings of records in a fixed context and only in that context. So long as the only option is the old-fashioned "one-thing-one-entry" approach, institutions will not be able to capitalize on the revolution in the thinking about administrative and intellectual control of recent years.

Krawczyk argues that standards of arrangement lag behind those for description. I believe it is quite the contrary. We now know in greater precision than ever before how to identify both the external and internal structure of archives. Descriptive standards, which still suffer from the "one-thing-one-entry" legacy of the past, lag behind our grasp of arrangement. Finely tuning descriptive standards to reflect our improved grasp of arrangement will greatly assist us to create both institutional and inter-institutional systems capable of satisfying researchers' needs to understand the historical context of records, the activities that generated them, and the information they contain.