

# Articles

## Past Imperfect? Reflections on the Evolution of Canadian Federal Government Records Appraisal<sup>1</sup>



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RÉSUMÉ Des décisions d'évaluation qui sont bien documentées, qui sont fondées sur la théorie et la pratique archivistiques bien établies et qui sont prises dans un cadre légal et politique approprié sont essentielles dans un contexte gouvernemental, et la société tient les archivistes de plus en plus imputables de leurs décisions de conserver ou de détruire des documents d'archives. Une analyse de la méthodologie de disposition et d'évaluation des documents d'archives du gouvernement canadien et des documents connexes révèle une progression à longue échelle, au fil de plusieurs époques différentes. L'expérience acquise en effectuant l'évaluation au cours de l'époque la plus récente, de pair avec une recherche au sujet du développement des pratiques de disposition des documents d'archives du gouvernement canadien pendant les 140 dernières années (y compris des preuves trouvées dans les documents d'archives et les documents opérationnels de Bibliothèque et Archives Canada), montrent qu'il existe des principes fondamentaux et des concepts clés qui peuvent et qui devraient appuyer la documentation liée à l'évaluation. On avance qu'une telle documentation devrait aussi s'appuyer sur quatre composantes de base – le contexte, la description, l'analyse et la décision – peu importe la méthodologie spécifique, le processus ou l'approche qu'un centre d'archives peut choisir d'adopter. On soutient que ces principes, concepts et composantes, bien enracinés dans l'histoire et les pratiques actuelles, devraient servir de fondement à la documentation nécessaire pour rendre compte des décisions d'évaluation.

- 1 The roots of this article are found in two versions of a conference paper entitled "Trust Me, It's All Good Stuff!: Appraisal Documentation," which was presented to the Association of Canadian Archivists (Calgary, May 2009) and the Society of American Archivists (Washington, DC, August 2010). I would like to thank my co-presenters, Heather MacNeil and Jennifer Meehan, and chairs Bill Landis and Laura Millar; our discussions in preparation for these sessions very much stimulated my thinking on appraisal documentation. I am also grateful to my colleagues Robert McIntosh, Brian Beaven, and Tina Lloyd, who offered many thoughtful and detailed comments on early drafts, as did the two anonymous peer reviewers on the submitted version; all of their suggestions have (I hope) strengthened the final version. It is important to note, however, that the thoughts and opinions expressed herein are entirely mine, and do not reflect any official position of Library and Archives Canada.

**ABSTRACT** Well-documented appraisal decisions, based on established archival theory and practice, and appropriately taken within a legal and policy framework, are essential in a government context, as archivists are increasingly held directly accountable by society for their recommendations to preserve or destroy records. An examination of Canadian federal records disposition and appraisal methodology and its documentation shows a long-term evolutionary progression through several different eras. Experience gained through the practice of appraisal within the most recent era, combined with research into the development of Canadian federal records disposition practices over the past 140 years (including evidence from the archival holdings and operational records of Library and Archives Canada) demonstrates that there are fundamental principles and key concepts that can and should support appraisal documentation. Such documentation, it is argued, should also be based on four core components – context, description, analysis, and decision – regardless of the specific methodology, process, or approach that an archives might use. It is argued that these principles, concepts, and components, rooted in history and actual practices, should be the foundation for the documentation necessary to account for appraisal decisions.

## **Introduction**

Archival appraisal theory and practice have long been topics of great interest and debate within the Canadian and international archival communities, and many contributions to that discussion have come from archivists at Library and Archives Canada (LAC) and its predecessors, the National Archives and Public Archives of Canada (NA/PAC). Government records archivists play a crucial role in determining which records will be preserved over the long term and thus available to citizens seeking to hold their government accountable for its decisions and actions. In turn, archivists are increasingly held accountable by society for their recommendations to preserve or destroy records. It is therefore clear that well-documented appraisal decisions based on archival theory and practice, appropriately taken within a legal and policy framework and subsequently defended when questioned, are essential.

In Canada, archival accountability became a paramount concern in February 1985 when the federal government established a royal commission to investigate the activities of Nazi war criminals in Canada. The Commission of Inquiry on War Criminals in Canada (the Deschênes Commission) conducted an in-depth examination of the apparent improper destruction of immigration case files in 1982 and the role that the then-PAC played in that destruction. Terry Cook's detailed account explains how the commission's findings became a catalyst for changes in the NA's government records disposition program, most notably the improvement of documentation on appraisal and disposition decisions.<sup>2</sup> Improved documentation complemented the major re-engineering

2 Terry Cook, "‘A Monumental Blunder’: The Destruction of Records on Nazi War Criminals

of appraisal methodology that the NA undertook in the 1990s, what is now known around the world as macroappraisal.

But macroappraisal's development, which is extensively chronicled elsewhere,<sup>3</sup> is not the only significant change to the process of archival appraisal of Canadian government records in order to respond to calls for increasing clarity, transparency, and accountability in appraisal decisions. What follows is an examination of the history of Canadian federal records disposition practices and appraisal methodology at the national archival institution (with a focus on textual records), where archivists began as secondary players but over the

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in Canada," in *Archives and the Public Good: Accountability and Records in Modern Society*, ed. Richard Cox and David Wallace (Westport, CT, 2002), 38–39. See also Robert Hayward, "'Working in Thin Air': Of Archives and the Deschênes Commission," *Archivaria* 26 (Summer 1988): 122–36.

- 3 For the history of the development of macroappraisal, see especially Terry Cook, "Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950–2000," *Archival Science* 5 (2005), 101–61; and Terry Cook, "Macro-appraisal and Functional Analysis: Documenting Governance Rather Than Government," *Journal of the Society of Archivists* 25, no. 1 (2004): 5–18. As Cook observes, the driving forces behind his involvement in the development and introduction of macroappraisal methodology at the National Archives of Canada stemmed from his involvement in the Deschênes Commission inquiry and his own personal misgivings about the validity of earlier, value-driven appraisal processes. It is important to note, however, that Cook was not developing macroappraisal concepts in isolation, as other archivists around the world were at that time expressing their own concerns with appraisal methodology and exploring new approaches. Most notable from the North American perspective was "documentation strategy," expressed by Helen W. Samuels in her seminal article, "Who Controls the Past?" *American Archivist* 49, no. 2 (Spring 1986): 109–24. Her article built upon the work she and her colleagues conducted at the Massachusetts Institute of Technology on documenting the records of modern science and technology. Spirited discussion of both macroappraisal and documentation strategy ensued after the 1991 Association of Canadian Archivists Annual Conference in Banff, Alberta, and much of that expression can be found throughout the pages of *Archivaria*, beginning in issues 33 and 34. Samuels later added the concept of institutional functional analysis to the original documentation strategy concept in her book *Varsity Letters: Documenting Modern Colleges and Universities* (Metuchen, NJ, 1992). For additional discussion on documentation strategy in the context of the development of macroappraisal, see the section entitled "The Development of Documentation Strategy" and accompanying notes (pp. 90–93) in Catherine Bailey, "From the Top Down: The Practice of Macro-Appraisal," *Archivaria* 43 (Spring 1997): 89–128.

For recent historical perspectives on the macroappraisal program, and specific elements thereof from the perspective of practising appraisal archivists, see Brian Beaven, "'But am I Getting my Records?' Squaring the Circle with *Terms and Conditions* Expressed in Relation to Function and Activity," *Archival Science* 5 (2005): 315–41; Catherine Bailey, "Turning Macro-appraisal Decisions into Archival Holdings: Crafting Function-based Terms and Conditions for the Transfer of Archival Records," *Archivaria* 61 (Spring 2006): 147–79; and the 2005 special issue of *Archival Science* entitled "Macroappraisal: Evolution and Application," with articles by LAC archivists Normand Fortier, Margaret Dixon, Candace Loewen, and Kerry Badgley, which address specific aspects of the NA/LAC disposition program, including the Records Disposition Authorities Control System (RDACS), the Case File Appraisal Working Group (CFAWG), the development of an accountability framework, and a disposition pilot project at the Department of Fisheries and Oceans.

years emerged to take a leading role.<sup>4</sup> Evidence in both the archival holdings and operational records of Library and Archives Canada shows a long-term evolutionary process in which key elected officials and senior civil servants, records managers, and ultimately professional archivists have examined and refined records appraisal and disposition practices within an ever-changing societal context, and brought us to the current situation in which archivists have assumed their essential role as keepers of the Canadian federal government archival record.

It can be argued that within this evolutionary process there is a clear progression through several different eras, beginning with a period that focused on identifying the historical value of government records for posterity only as a consideration secondary to ongoing operational requirements. This “historical/cultural” era (which persisted until well after the Second World War and can be further subdivided into two parts) was characterized by a significant reliance upon records creators, not archivists, for the determination of what constituted “historical value.” This initial era subsequently gave way to a second, more active and records management-oriented era in which archival records were identified through an archivist’s explicit determination of secondary values and possible uses. The third era, which began in the early 1990s, is characterized by strong drives for societal accountability and sound recordkeeping, in which archivists have sought to root their appraisal processes and decisions in a broader, societally based framework that takes into consideration much more than just “records.”

Archivists at Canada’s national archival institution have had an appreciation of the continual progression of archival appraisal theory, particularly for government records, throughout these three eras. As a practising government records appraisal archivist at the National Archives/Library and Archives Canada since 1988, I have used the approved methods and procedures from the second and

4 There are numerous works that describe not only the history of the Public and then-National Archives of Canada, but also various aspects of the development of recordkeeping and records management within the Government of Canada and the nature of archival involvement. See, for example, Danielle Lacasse and Antonio Lechasseur, *The National Archives of Canada 1872–1997*, Canadian Historical Association Historical Booklet No. 58 (Ottawa, 1997); Ian E. Wilson, “A Noble Dream: The Origins of the Public Archives of Canada,” *Archivaria* 15 (Winter 1982–83): 16–35; William G. Ormsby, “The Public Archives of Canada, 1948–1968,” *Archivaria* 15 (Winter 1982–83): 36–46; Jay Atherton, “The Origins of the Public Archives Records Centre, 1897–1956,” *Archivaria* 8 (Summer 1979): 35–59; and Terry Cook, “An Archival Revolution: W. Kaye Lamb and the Transformation of the Archival Profession,” *Archivaria* 60 (Fall 2005): 185–234. In addition to these histories, Daniel J. Caron explores and analyzes the development of recordkeeping in three “eras” of federal public administration, addressing the issues of transparency and accountability: Daniel J. Caron and Andreas Kellerhals, “Supporting Democratic Values Through a Relevant Documentary Foundation – An Evolutionary Complex,” *Archivaria* 71 (Spring 2011): 99–134 (see in particular pp. 101–17).

third eras described above to conduct many appraisals covering both very large and small government institutions from a number of different subject portfolios. I have also been responsible for interpreting the appraisal decisions made by my predecessors in the first era and applying them to current government record-keeping situations, and advising on and reviewing new appraisals currently being conducted. Throughout, I have sought to understand and critically analyze the contextual framework in which the appraisals were/are done, in order to ensure the ongoing development and refinement of appraisal practices.

This paper is therefore more than simply a historical examination; it is also a reflection, based on personal experience, on what we might learn from our history and practices that can carry us into the future. I argue that the actual practice of appraisal within the current (third) era, which is characterized by constant evolution of the recordkeeping accountability environment, combined with research into the development of Canadian federal records disposition practices over the past 140 years, demonstrates a number of fundamental principles and key concepts that can and should support the creation of appraisal documentation based on four core components – context, description, analysis, and decision – regardless of the specific methodology, process, or approach that an archives might use. Rooted in history and actual practices, these principles, concepts, and components are universally applicable. They are equally valid for any government records appraisal, and could be adapted to the appropriate legal, historical, and/or political contexts in which appraisal is conducted. Furthermore, regardless of the specific appraisal process, which can and should change over time to reflect changes in society and records creation practices, these elements should remain unaltered; they should be the foundation of the appraisal documentation that we create, both to account for our decisions at the time they are made and to ensure their continuing applicability in order to acquire the best archival records.

## **I. The Evolution of Records Appraisal and Disposition within the Canadian Federal Government, 1890–2011**

### ***The historical/cultural era, part 1: Dealing with documents that “encumbered the vaults” (1890–ca. 1944)***

Canada’s first archival legislation – the *Public Archives Act* – was not passed until well into the twentieth century, by which time the federal government had already made several attempts to better manage its records without the direct assistance of the Public Archives, which had been established in 1872. As Jay Atherton noted,<sup>5</sup> during the late nineteenth century, key senior

5 Atherton, “Origins of the Public Archives Records Centre.”

Canadian government officials were increasingly concerned about the state of government recordkeeping. Their concerns were twofold: there were undoubtedly records of “historical value” mixed in with “useless” records of “a routine nature,” and the sheer volume of stored paper was becoming a serious fire hazard.

Attempts to establish proper federal records management to address these issues began in 1890; the order-in-council that established a disposition authority for the Post Office also directed that government departments review the state of their records “with the view of having those documents destroyed which were useless and merely encumbered the vaults.”<sup>6</sup> Based on this review, Treasury Board (TB) would be able to develop a system “whereby the papers of each Department may be weeded out and what is found to be of no value destroyed after the lapse of certain periods.”<sup>7</sup> Unfortunately, little concrete action was taken, and by early 1897 Under-Secretary of State Sir Joseph Pope was sounding the alarm that the nation’s historical records were at risk. In a lengthy letter, Pope noted “the urgent need that exists for the establishment of a system that shall unite and preserve in accessible and permanent form the great mass of valuable documents at present scattered throughout the various departments.” Referring to a departmental attic overflowing with records, Pope’s warning that “a match would set the whole thing in a blaze and the loss would be irreparable”<sup>8</sup> proved to be prophetic when, on 11 February 1897, the top floors of the West Block of the Parliament Buildings were heavily damaged by a fire that destroyed large amounts of historical records.<sup>9</sup> Spurred to action by this event, TB appointed a departmental commission (comprising Pope and two other senior officials) in accordance with the terms of the original order-in-council of 5 July 1890.<sup>10</sup> Thus began the first of several periodic reviews of the state of Canadian federal records.

- 6 Under the first Canadian federal records disposition authority, the Post Office was authorized to destroy some routine financial records after a five-year retention period. Library and Archives Canada [hereafter LAC], Records of the Privy Council Office, RG 2/R165, series A-1-a, vol. 561, Order in Council P.C. 2873/89, 5 July 1890. See also Atherton, “Origins of the Public Archives Records Centre,” 38.
- 7 LAC, Departmental Commission on Public Records, RG 35/R776-46-7, series 1, vol. 1, “Minutes of the proceedings of the Departmental Commission appointed to enquire into and report upon the state of the Public Records,” 1897, 1.
- 8 LAC, National Archives of Canada, RG 37/R1185, vol. 303, file “PAC History Part 2,” Sir Joseph Pope to the Honourable R.W. Scott (Secretary of State), 7 January 1897, 1 and 6.
- 9 Atherton, “Origins of the Public Archives Records Centre,” 38–40.
- 10 Also appointed were Deputy Minister of Finance J.M. Courtney and Auditor General J.L. McDougall. Interestingly, neither Douglas Brymner, the first dominion archivist, who had ostensibly been responsible “for the collecting of Public Archives” since 1872 (Order in Council P.C. 712, 20 June 1872), nor Henry J. Morgan, the “keeper of the public records,” who had been appointed in October 1873 under the jurisdiction of the Secretary of State, were appointed to this Commission (Lacasse and Lechasseur, 11). Brymner did, however, play an advisory role.

After surveying nineteen departments and offices, the commissioners observed that within the vaults, among the mountains of papers that had ongoing value for business purposes, there were also certainly records of historical value;<sup>11</sup> however, the process for selecting which of those records might have historical value and thus be preserved (perhaps in the Public Archives) was ad hoc at best. As a British colony, government officials had brought forward established British government recordkeeping practices; one of Pope's first acts was, therefore, to consult the Public Records Office (PRO) in London about how government records disposal was carried out in England, in the hopes of modelling a Canadian system along similar lines.<sup>12</sup> In response, Pope received a copy of the 1890 British order-in-council *Rules for the Disposal of Documents which are not of sufficient Value to justify their Preservation in the Public Record Office*. In the accompanying letter, it was observed that there were no special rules specifying when departmental records were to be transferred to the archives for permanent preservation, but that transfer occurred only after "such weeding ... as is necessary to avoid the keeping of valueless papers."<sup>13</sup> Under these *Rules*, no fewer than three appointed "Inspecting Officers" would produce schedules, taking "every precaution against the inclusion therein of any documents which can reasonably be considered of legal, historical, genealogical, or antiquarian use or interest, or which give any important information not to be obtained elsewhere."<sup>14</sup>

In its November 1897 report, the commission made several recommendations, including establishing a separate (fireproof) records office modelled on the PRO and allowing departments to deposit selected papers "over a certain age." They further recommended that a committee be established to oversee

- 11 All nineteen of the commission's site visit reports are found in LAC, RG 35/R776-46-7, vol. 1, bound volume, "Minutes of the proceedings of the Departmental Commission appointed to enquire into and report upon the state of the Public Records, 1897"; they are also repeated in the commission's published report.
- 12 LAC, RG 35/R776-46-7, vol. 1, bound volume, "Minutes of the proceedings of the Departmental Commission appointed to enquire into and report upon the state of the Public Records, 1897," Joseph Pope (Under-Secretary of State) to Henry C. Maxwell Lyte (Deputy Keeper of the Records), 17 February 1897.
- 13 Ibid., J.J. [Carkowski] to Joseph Pope, 4 March 1897, 1.
- 14 LAC, RG 35/R776-46-7, vol. 1, file "pt. 2, 'Rules for the Disposal of Documents which are not of sufficient Value to justify their Preservation in the Public Record Office,'" section 7, 1890, 3. The three inspecting officers included the deputy keeper of the records, one assistant record keeper, and one other officer (who was required to be a "barrister of seven years' standing," if neither of the record keepers met that requirement). The inspecting officers were required to produce at least one schedule per year of records proposed for disposal, in conjunction with departmental officials. There were, however, no instructions given as to how the "legal, historical, genealogical, or antiquarian use or interest" for records was to be determined.

and approve regular destruction recommendations.<sup>15</sup> The commissioners also presented their vision of a responsible selection process: a board of inspection “composed of one or more experienced persons, if possible members of the public service” that would visit and, in conjunction with the department’s deputy head, “determine by detailed personal examination what papers, books, maps or other documents might be destroyed forthwith.” Finally, board members would provide “guiding principles ... which should govern the periodical destruction of departmental papers in the future.”<sup>16</sup> Despite these recommendations, however, the commission did not define the format of any required documentation that would result from the selection process that they advocated.<sup>17</sup>

The commission’s recommendations were largely ignored, and were essentially repeated fifteen years later by the Royal Commission Appointed to Inquire into the State of the Records of the Public Departments of the Dominion of Canada, which was established shortly after the 1912 passage of the *Public Archives Act*, which assigned responsibility for government records to the dominion archivist.<sup>18</sup> In their 1914 report, the commissioners not only reiterated their predecessors’ points (including Brymner’s) but also forcefully stated the need for formal TB approval of selection decisions:

[T]he board of inspection ... should be guided by rules similar to those governing the destruction of Public Records in England ... these rules should receive the sanction of [the Governor General in Council], and *no papers should be actually destroyed without the specific authority of the Treasury Board.*<sup>19</sup>

15 *Report of the Commissioners Appointed to Inquire into the State of the Public Records*, 1897 (Ottawa, 1898), 11.

16 *Ibid.*, section 3, “What papers or records might be destroyed, and after what interval of time,” 10.

17 It is important to note that none of the recommendations regarding selection were made by Dominion Archivist Douglas Brymner. Although government records per se were not the focus of his own collecting interests, Brymner’s memorandum expressing opinions and concerns about the selection process (particularly the threat of political interference and the impact of disposing of related correspondence) comprised the last five-and-a-half pages of the commission’s report [*Report of the Commission*, “Appendix D. Miscellaneous Memoranda and Correspondence Addressed to the Commissioners,” 65.]

18 The commission was established by Order-in-Council P.C. 3054 on 9 November 1912 (LAC, Records of the Privy Council Office, RG 2/R165, series A-1-a, vol. 1050). While the *Public Archives of Canada Act*, 1912, section 6, noted that “The Public Archives shall consist of all such public records, documents and other historical material of every kind, nature and description as, under the provisions of this Act, or under the authority of any Order in Council made by virtue thereof, are placed under the care, custody and control of the Dominion Archivist,” the Act neither imposed records management requirements on government departments nor defined the Archives’ role in records disposition. The new dominion archivist, Arthur G. Doughty, was, however, named as one of the three commissioners, along with Joseph Pope and Ernest Frederick Jarvis (assistant deputy minister and secretary of the Department of Militia and Defence).

19 *Report of the Royal Commission Appointed to Inquire into the State of the Records of the Public Departments of the Dominion of Canada* (Ottawa, 1914), 12 (emphasis added). While



Unfortunately, that requirement for TB authorization would not be enacted for more than twenty years.

To this point, then, the government's approach to the preservation of its historical records could at best be described as sporadic, even desultory. Despite the serious efforts of various commissions, inquiries, and key senior government officials, records disposition activities continued to lack a strong, legislative/policy-based process and comprehensive documentation of the context (the method and criteria used) in which selection of historical records was done. The approach during this early historical/cultural era could thus be dubbed one of "archives by natural selection," and it might have continued for some time had it not been for the increasingly proactive role taken by Treasury Board and the massive transformation of the Canadian government and its recordkeeping, which was sparked by the advent of the Second World War.

***The historical/cultural era, part 2: The rise of the Public Records Committee (ca. 1944–66)***

Few substantive changes in government disposition practices took place between 1914 and 1936, when the tremendous pressure of the Great Depression on government finances prompted Treasury Board to act to reduce the impact of managing records retained by departments past their operational use; TB's role to approve departmental records destruction thus increasingly strengthened, largely as a cost control and reduction measure. As TB took the operational lead to establish an effective program to manage and dispose of government records, the role of the dominion archivist began to increase as well. While the power to authorize destruction or preservation of government records was not invested in him, the dominion archivist was given an advisory role: to "object" to disposition recommendations, based on an understanding of the historical implications. However, there is little evidence within TB records that this power was exercised on a regular basis.

Formal authorization to destroy government records was granted by Treasury Board Minute 160481, issued on 2 June 1936. The board noted that, while "uniformity throughout the public service is probably inadvisable on account of the diverse uses in different departments of similar classes of documents," it could establish a set of standard classes, proposed retention periods, and five types of restrictions on disposal. While the first four dealt primarily with identifying record classes and the operational or business needs of the

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this report was published, it was never tabled before the House of Commons.

government, emphasizing financial management,<sup>20</sup> the fifth was of most interest to historians and archivists:

Documents of general historical value shall be retained indefinitely. With the object of ascertaining such value, the Dominion Archivist shall be notified by the Department concerned of the intention to destroy certain classes of documents and, unless he submits a written objection (stating his reasons from the historical viewpoint) within a period of six months, the Department may proceed to destroy such classes of documents. If objection is taken, and the department is not content to accept the view of the Dominion Archivist, the record shall be referred for the decision of the Treasury Board.<sup>21</sup>

This restriction demonstrated that, while the power for approving disposition requests rested within TB's operational focus and "historical value" remained a secondary concern for government departments, there was an increasing sensitivity to the need for historical preservation, albeit with a persistent "antiquarian" undertone.

Treasury Board continued to take an active role with respect to records disposition, particularly during the Second World War. In January 1944, the Comptroller of the Treasury, noting the "acute paper shortage," requested that all departments review and amend their schedules "with a view of increasing the amount of documents, copies of correspondence, etc., which might be disposed of without impairing the records of any Department."<sup>22</sup> Treasury Board Minute TB 260350B, subsequently approved on 16 March 1944, broadened the 1936 disposal authorization by permitting the destruction of "Departmental documents, copies of correspondence, file cases, etc." It was accompanied by lists from each affected department, labelled "destruction of old documents," and contained the standard restrictions on disposal that had been in place since 1936. There was, however, one major wording change to the "historical" restriction: whereas in 1936 any written objection by the dominion archivist to the destruction of historical material was to be done

20 The four restrictions were: (1) vouchers, accounts, and books of account and paid cheques (or copies) would be retained for ten years; (2) "documents, accounts or agreements pertaining to operations or transactions not terminated or where litigation is involved shall be held until the matter is finally dealt with"; (3) "voucher and documents pertaining to Indian or other Trust Funds shall be retained indefinitely unless some authentic record is maintained"; and (4) "Departments shall retain indefinitely documents required to establish records of service of employees" (LAC, Treasury Board, RG 55/R776, series A-1, vol. 20032, file "TB minutes 1936 Jan-June," TB Minute 160481, 2 June 1936, 1).

21 *Ibid.*, 1.

22 LAC, RG 55/R776, series A2, vol. 80, Report supporting TB Minute 260350B, "Miscellaneous – Amendment of Regulation Respecting Destruction of Old Documents," [n.d.], 1.

within six months, the 1944 authorization merely stated “unless he submits a written objection immediately.”<sup>23</sup>

The situation changed again toward the end of the war. In June 1944, the Secretary of State convened an informal Advisory Committee on Public Records, the duties of which were “to give consideration to methods for providing adequate conservation of the public records, with particular reference to the wartime activities of the government.”<sup>24</sup> The committee’s report was a watershed moment in Canadian federal records disposition. Noting that the war had greatly increased the number of government departments, agencies, and boards, and that the volume of records had multiplied through the resulting increased level of government business, the committee carefully considered its best course of action, and concluded that the issue was much broader than simply dealing with the effects of war on the federal bureaucracy and the disposition of “war records.” The government needed a “more adequate provision for the handling of the rapidly accumulating government records [because] unless early steps are taken, destruction of important records may take place.”<sup>25</sup> The committee went on to emphasize that preserving public records was not an end in itself, nor simply a means of making sources available to future historians; retaining public records “after careful scrutiny,” they observed, “is of the utmost importance not only for the preparation of suitable histories or narratives concerning the work of such boards, or for historical research, but also for future information and guidance should circumstances of a like nature arise.”<sup>26</sup>

This report contains a hint of a changing attitude, a potential shift away from the earlier approach of allowing civil service creators to determine, based largely on their analysis of various operational requirements, the historical value of government records, and toward a perception of historical documents as sources for future policy development. This possible shift comes first from the committee, which observed, without stating outright who should be making these selections, that “it would seem wiser to judge on the basis of providing for future reference an adequate record of the existence, function, and work of the various units of government rather than on the hypothetical needs of the historian of the future.”<sup>27</sup> In reading the conclusion that “Public Archives must not be considered as merely the repository for material of sentimental or antiquarian interest but a source of information on past practices and

23 LAC, RG 55/R776, series A, vol. 149, file “TB Minutes 16 March 1944,” TB Minute 260350B, 16 March 1944, 1.

24 LAC, RG 37/R1185, vol. 305, file “Public Records Committee,” “Report of the Advisory Committee on Public Records,” 16 July 1945, 1.

25 *Ibid.*, 2.

26 *Ibid.*, 3–4.

27 *Ibid.*, 9.

policies,”<sup>28</sup> it is interesting to note that it was this group of senior government officials – records creators, not archivists – who appear to have articulated some of the earliest concerns about conducting appraisal and selection based on the anticipated future use of records. These observations would be echoed by archivists at the Public Archives of Canada forty years later as evidence of the need to move away from a value-driven (sometimes referred to as “value-through-use”) appraisal process.

The government reacted promptly, concretely, and positively to the Advisory Committee’s recommendations: on 20 September 1945, the Public Records Committee was established and specifically charged with examining and reporting on the preparation of departmental accounts of wartime activities and implementing the recommendations of the 1914 royal commission.<sup>29</sup> In an undated report, likely written in late 1945, shortly after its formation, the new committee addressed the need to select only some records from the masses of government information for permanent preservation:

It is obvious that the Government could not and should not contemplate preserving such huge masses of paper.... The problem remaining present and urgent, it seems the preliminary and indispensable task, is the drastic elimination from this mass of material, of all records that present no actual or future value, either administrative, financial or historical....

There is no doubt that this task of eliminating unrequired material is one that can be carried out only by the agencies that have produced, organized and still control the records. They alone possess, with the necessary experience, the full knowledge of the purpose, use, system and value of the records under review.<sup>30</sup>

While this position retained the creator-driven approach to selection, at the same time there was an articulation of some archival-sounding “guiding principles” to be used by the government agency staff carrying out the review

28 Ibid., 10.

29 LAC, RG 37/R1185, vol. 13, file 50-13-2, Order in Council P.C. 6175, 20 September 1945, section 4, 2; see also LAC, RG 2/R165, vol. 1912. The committee was chaired by the secretary of state (at that time, the minister responsible for the Public Archives) and supported by a secretary at the Privy Council Office. Other members included representatives from the Public Archives, National Defence, Public Works, Finance, Munitions and Supply, Labour, and External Affairs; the order also noted that “The Canadian Historical Association shall be asked to recommend two professional historians to act in an advisory capacity to the Committee.” In addition, although other government departments were not directly represented on the committee, they were responsible for the “care and maintenance of records and for seeing that the policies of government in respect to disposition of public records be carried out so as to ensure that material of permanent value be not unwittingly destroyed” (section 6, 2).

30 LAC, RG 37/R1185, vol. 305, file “Public Records Committee,” “Committee on Public Records,” [n.d.], 1-2.

and selection. Recognizing that “every agency includes an essential body ... of records of permanent value to the Government or to history,” the staff’s first task was to recognize and segregate these records; selection of records of permanent value, it was noted, could be based on the broad principle that the agency should be retaining records that were “necessary to show and substantiate ... a) the story, organization and work of the agency; b) the policies adopted and their motives; c) the general or special situation influencing its operations; d) the operations creating legal claims or presenting historical interest.”<sup>31</sup>

These guiding principles were a step forward in the government records disposition process, but they were only part of the solution. Despite the growing presence of the dominion archivist in the official process, and the recognition of the importance of historical value, government departments were still acting as their own archivists, appraising and selecting archival records via recommendations to Treasury Board but without providing full written justification to support them. What remains in the TB records are summary statements and lists of what was to be disposed; the implication of this documentation, which often continued to focus on the disposal of routine records associated with financial management and control, was that any supporting rationale was somewhat self-evident to the committee (and thus to TB). Regrettably, that rationale was not necessarily evident to anyone outside the committee context (i.e., an archivist seeking to implement these disposition decisions many years in the future, or a historical researcher seeking to understand why certain records no longer existed).

At the same time, however, the stage was set for what Terry Cook refers to as an “archival revolution,” led by the fourth dominion archivist of Canada, William Kaye (W. Kaye) Lamb. From an archival perspective, Lamb did have the transformational role for which Cook argues persuasively.<sup>32</sup> Viewed in the context of the management of Canadian federal government records between 1944 and 1966, however, the role of the dominion archivist was essentially one of advice and influence, not the direct power of disposal authorization, which continued to rest with Treasury Board. What Lamb did during his tenure (1948–69) was set the stage for the national archival institution to assume the significant role in disposition that Library and Archives Canada now plays;

31 Ibid., 2–3.

32 Cook, “An Archival Revolution,” 185–234. This extensively researched article received *Archivaria*’s W. Kaye Lamb Prize in 2006. Some other works that directly address the impact that Lamb had on the Public Archives of Canada can be found within a special issue of *Archivaria*, entitled “Archives and Libraries: Essays in Honour of W. Kaye Lamb” (issue 15, Winter 1982–83), notably Wilfred I. Smith, “W. Kaye Lamb”: 9–15; Ian E. Wilson, “A Noble Dream: The Origins of the Public Archives of Canada”: 16–35; and William G. Ormsby, “The Public Archives of Canada, 1948–1968”: 36–46.

he did so through his aims of enhancing what is now known as the concept of “total archives” and the establishment of strong federal government records management, in which trained professional archivists would play a key role.

Dr. Lamb understood the pressures and constraints inherent in the explosion of post-war government information creation, concerns that persist to this day. In his article “The Fine Art of Destruction,” he noted that “the sheer bulk of modern records makes destruction inescapable. The extent and cost of storage space in which to retain them all would be prohibitive. The difficulty is to decide wisely and well what shall be destroyed and what shall be retained.”<sup>33</sup> Rejecting the previous approach to government records disposition, which placed the responsibility for selecting historical records in the hands of the creating institution and left the Public Archives in a reactive position, Lamb instead embraced the methods of Theodore Schellenberg and Margaret Cross Norton in the United States (encouraging his staff to do the same),<sup>34</sup> and argued that appraisal should be conducted by trained archivists, noting that “only the archivist and his staff and advisers can judge the long-term value of many items.”<sup>35</sup>

Clearly Lamb wanted the modern archivist to be far more than a custodian of records that others chose to preserve; he wanted archivists to make those decisions. As a result, under his direction the Public Archives began to engage archivists with the necessary research skills and academic (historical) training for archival appraisal so that they could also interact more directly and intensely with government institutions in the management of their records. Archivists were also encouraged to undertake their own research and publica-

33 W. Kaye Lamb, “The Fine Art of Destruction,” in *Essays in Memory of Sir Hilary Jenkinson*, ed. Albert E.J. Hollaender (Chichester, UK, 1962), 50–51.

34 Cook, “Macroappraisal in Theory and Practice,” 107; see also Terry Cook, “What is Past is Prologue: A History of Archival Ideas Since 1898, and the Future Paradigm Shift,” *Archivaria* 43 (Spring 1997), 26.

35 Lamb, “The Fine Art of Destruction,” 56. It is important to consider that when Lamb speaks of “the archivist,” he is often not referring to a working-level government records archivist, but to the dominion archivist, in whom the authority for the majority of archival decision-making rested. In fact, the Public Archives of Canada’s first organizational unit specifically responsible for government records – the Public Records Section of the Manuscript Division – was not established until 1 April 1965. Until that time, archivists within the Manuscript Division’s Post Confederation Section handled any required duties related to government records. Lamb also observed: “Every archivist knows that documents may prove to be useful and valuable for a wide variety of purposes that may have little or no relationship to the purpose for which they were brought into existence. And for this very reason the officials of the department that created them may be very poor judges of their long-term value.... Archival collections are rich in documents that have all sorts of unexpected values ... and it is my contention that, by and large, the archivist is the person most likely to perceive them, or to suspect their existence. It is his business to take the long-term view. And his day-by-day experience in helping those engaged in research should give him a background against which to judge the usefulness of material that someone is proposing to discard” (*Ibid.*, 52–53).

tion activities.<sup>36</sup> Combined with the establishment of records management as a core function of the Public Archives itself, which it had not been before,<sup>37</sup> PAC began to solidify what it saw as its central role in the appraisal and selection of government records. This position was strengthened in 1961 by the appointment of the dominion archivist as the vice-chair of the Public Records Committee (PRC).<sup>38</sup>

Throughout the 1950s and into the 1960s, the PRC itself was gradually increasing its instructions to government departments about how to seek and better support recommendations for disposal of records, instructions that were beginning to include many of the archival innovations that Lamb was expressing at PAC and throughout the archival and records management community. A significant event was the issuance in early 1957 of the *Schedule of Records Common to Departments and Agencies of the Federal Government*. Intended to guide government institutions, the schedule was prefaced by two rule sets: “General Rules to Determine Retention Periods for Review and Disposition of Records” and “General Rules in Applying Review Procedure for Retention or Disposition of Records.” Within the latter section were four elements that had to be addressed by departments prior to disposal; the first three related to the record’s administrative status, and the fourth was that “the files or documents are of no value for historical or research purposes by the Department/Agency, or would be of no use to Historians, Students etc.; using documents permanently retained by the Public Archives [sic].”<sup>39</sup>

Although the departments were not actually making the decision on historical (archival) value, they were being asked to provide the *evidence* upon which the PRC (with the advice of the dominion archivist) would approve the dispos-

36 Cook, “An Archival Revolution,” 198, 201–5.

37 *Ibid.*, 206–16. In 1966, three functional branches were established within the Public Archives of Canada: the Records Management Branch, the Historical Branch, and the Administration and Technical Services Branch (Ormsby, “The Public Archives of Canada,” 42). For other perspectives on the development of the records management profession within the Canadian context, including its relationship to the Public Archives of Canada, see Atherton, “Origins of the Public Archives Records Centre”; Sian Madsen, “The Evolution of Recordkeeping at the Hudson’s Bay Company,” *Archivaria* 66 (Fall 2008): 25–56; and W.E.D. Halliday, “The Public Records of Canada: Recent Developments in Control and Management,” *American Archivist* 13, no. 2 (April 1950): 102–8.

38 LAC, RG 37/R1185, vol. 307, file 50-13-3, “Administration Committee etc. – Public Records Committee – Minutes,” copy of Order in Council P.C. 1961–212, 16 February 1961, 1; see also in the same file “Circular No. 5,” 15 May 1961, 1.

39 LAC, RG 37/R1185, vol. 13, file 50-13-2, 3. The three administrative elements were: “(a) Action on the record must be concluded and the information contained therein be of no further value either for administrative, legal, financial or investigative use [by] the Department/Agency or any other Department/Agency of the government. (b) The information or record will not be required for the protection of civic, legal, property or other rights of the staff or general public. (c) The record will be of no value for useful documentation of the Department/Agency or studies in procedures and operations.”

al decision. The committee followed up on these instructions with circulars in 1961 and 1962 that included increasingly detailed disposition directions,<sup>40</sup> and in September 1963, Treasury Board published the seminal *General Records Disposal Schedules of the Government of Canada* (GRDS),<sup>41</sup> which was to last (through several revised editions) for over thirty-five years.<sup>42</sup>

The issuance of the GRDS reinforced the growing involvement of the Public Archives in appraisal supporting records disposition. Departments were advised that they were to use the GRDS only to dispose of “administrative housekeeping records and not ... operational records created ... while carrying out their basic functions.”<sup>43</sup> However, the most notable feature of this new schedule from the appraisal perspective was the introduction of the concept of “selective retention,” whereby departments were informed that “the authority for destruction exists, but the Archives wishes to make a selection from the records involved before the authority is applied.”<sup>44</sup>

With the establishment of a solid policy framework for government records disposition, led by Treasury Board and supported by the increasing involvement of the dominion archivist and his staff in determining the long-term historical value of records, the stage was now set for the next important era

40 See, for example, LAC, RG 37/R1185, vol. 307, file 50-13-3, “Administration Committee etc. – Public Records Committee – Minutes,” “PRC Circular No. 5,” which included a definition of “public records” as well as the process for requesting approval for disposal of public records (pp. 1–2).

41 *General Records Disposal Schedules of the Government of Canada* (GRDS) (Ottawa: Queen’s Printer, 1963). This document had been originally prepared by the Disposal and Scheduling Section of the Public Archives Records Centre.

42 Between 1998 and 2001, the latest version of the GRDS (PAC 86/001) was replaced with a series of Multi-Institutional Disposition Authorities (MIDAs) issued by the National Archives, covering the General Administration, Real Property Management, Materiel Management, Human Resource Management and Comptrollership functions. It is, however, important to note that these MIDAs did not include disposition authorization for all of the records that had been previously covered by the GRDS. See LAC, Multi-Institutional Disposition Authorities (MIDA), <http://www.collectionscanada.gc.ca/government/disposition/007007-1008-e.html> (accessed 19 September 2011).

43 *General Records Disposal Schedules* (GRDS), 1963, 1. The GRDS also explained the concept of “working papers,” which was later codified and refined as “transitory records,” prior to its inclusion in the National Archives’ *Authority for the Destruction of Transitory Records*, issued in December 1990, <http://www.collectionscanada.gc.ca/government/disposition/007007-1016-e.html> (accessed 30 August 2011).

44 GRDS 1963, 4. The concept of selective retention proved to be problematic to sustain over the long term, and was later addressed in large part by the development and approval of LAC’s *Multi-Institutional Disposition Authority for Operational Case Files of the Government of Canada* (MIDA 2005/006), <http://www.collectionscanada.gc.ca/obj/007007/f2/007007-1008.12-e.pdf> (accessed 5 October 2012). However, at the time, selective retention was an institutional codification of the power of the dominion archivist to intervene in disposition when he objected to the disposal of records of potential historical value.



in the evolution of Canadian government records disposition: the focus on records management.

***The records management era (1966–ca. 1990)***

In 1966, the federal government enacted the *Public Records Order*,<sup>45</sup> which formally linked the historical/cultural mandate of the Public Archives with the responsibility to improve the management of government records. The key element of the Order was that it compelled departments to establish records retention schedules and submit them to the dominion archivist for approval. The enactment of the Order was Treasury Board's formal approval of the delegated authority of the Public Archives as the entity responsible for ensuring proper records management within the federal government; as a corollary, the Order solidified PAC's responsibility for identifying and managing government records of archival value.

It is during this era that we see evidence not only of archival policy and procedures influencing and contributing to records management, but also the introduction of the formal requirement to document appraisal/selection decisions. Archivists in PAC's Public Records Division<sup>46</sup> (PRD) were assigned the responsibility to examine records schedules prepared by government departments for their textual records, and to prepare a three-part assessment report:

- (a) An opening paragraph describes any discussion between Public Records Division staff, other Archives staff and members of the department or agency....
- (b) The core of the report, consisting of one or more paragraphs, describes and evaluates the records. The evaluation must justify adequately the final recommendations and, should the records be transferred to the Public Records Division at a later date, provide adequate information for future reference without further examination of the material. The emphasis should be on archival and historical values; technical records management or microfilm factors are evaluated separately....
- (c) The final paragraph provides a recommendation to archival retention,

45 LAC, RG 2/R165 (Privy Council Office), vol. 2357, Order-in-Council P.C. 1966-1749, 9 September 1966.

46 The Public Records Section of the Manuscript Division, established in 1965, became the Public Records Division (PRD) on 1 April 1973, at which time the Machine Readable Archives Division (MRA) was also established. The PRD became the Federal Archives Division (FED) on 1 April 1979, and was subsequently merged with the Machine Readable Archives Division to create the Government Archives Division (GAD) on 1 December 1986.

if the records are of interest to the Public Records Division. When the records are not of historical interest, the recommendation should be replaced by a statement that we have no objection to the approval of the submission.<sup>47</sup>

PAC's archival procedures for textual records emphasized the importance of schedules in the records disposition process by stating: "The schedule is produced to facilitate current records operations and to identify records for permanent preservation in the Public Archives of Canada."<sup>48</sup> What is noticeable in this context is that selecting archival records took second place to facilitating records management – this was a persistent focus that affected the Public Archives' government records appraisal process for many years.

Although the procedure paper noted that the report was intended to provide recommendations to the dominion archivist on the historical and archival implications of departmental submissions, and makes reference to the need for evaluation/analysis, the specific means by which archivists were to conduct such analysis was left somewhat undefined. The expectation was that as trained historical researchers, archivists would use their subject expertise and knowledge to identify uses to which records might be put once their primary usage was at an end, thus reflecting the prevailing values-based appraisal techniques of the time. However, their analysis was also procedurally limited to a few summary paragraphs, rather than lengthy scholarly treatises that might have provided a more detailed and broader contextual overview of the recommendations being made for preservation that would have ensured their future applicability.

In fact, PRD archivists were clearly and explicitly trained to use the values-based model of appraisal. In the 1973 divisional procedure paper entitled "The Appraisal of Government Records," used for PAC's training course, director Jay Atherton begins by asserting that appraisal is "one of the most difficult tasks which an archivist must deal with," and then goes on to address the means and the model through which the PRD archivists will handle this central and yet subjective task:

It is obviously quite impossible for an archives to keep everything that might be of interest to someone at some time – yet a document which is destroyed is irretrievably lost. The dilemma is a serious one. What makes it especially serious is the fact that appraisal is so often a subjective exercise, in that the person undertaking it must use individual discretion.<sup>49</sup>

47 Public Archives of Canada, Public Records Division, Procedure Paper B-2, "Procedures for Review of Departmental Submissions," copy in author's possession.

48 Ibid.

49 Jay Atherton, "The Appraisal of Government Records" (Public Archives of Canada, Public

The paper that followed this introduction is a thorough summary of the key elements of classic appraisal techniques as outlined by Schellenberg and how they should be followed within PAC: the distinctions between primary and secondary values; the categorization of records according to evidential and informational value; the relative importance of the three main classes of records (policy, operational, and housekeeping); and the use of sampling or selection criteria. However, what is striking about these instructions, which formed a key part of PAC appraisal training for several years, is not the values-based method that is outlined, nor even the observation that the instructions do not specifically address what the archivist needs to document when making his or her appraisal decision. What is noteworthy is that throughout the paper Atherton seeks to impart to his readers a mindset for textual government records appraisal that seeks a workable solution to complex and seemingly insoluble problems: the inability of archives to keep everything forever; the difficult (but necessary) selection of records based on anticipated future use; and the problem of subjectivity and how to combat it. Along the way, he also relies upon his own appraisal experience and that of his fellow archivists to provide new archivists with concrete and practical examples to illustrate just how the subjective practice of appraisal can and should be done.

As valuable as this documented practical experience would have been to a contemporary PRD archivist, it was striking to me, an archivist practising twenty years later, that Atherton did not seem to question the validity of selecting archival records based on secondary values and anticipated future uses. This instruction to explicitly address anticipated use in an appraisal would have been a valid approach if the appraising archivist was always a subject-matter expert, but in the cases where the archivist was not actually assigned to assess records within his or her area(s) of expertise, the effectiveness of the appraisal would have been significantly undermined. While it can be argued that the appraisals conducted using this methodology were still considered “successful” in that they did result in significant records acquisitions through the application of records schedules, the questions remain: Did those use-based decisions actually identify the “best records” to preserve over the long-term? Or were they merely evidence of the simple truth that every record that is created usually has some secondary use for someone in the future?

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Records Division, 1973), 1–2, LAC file MB 8059-74 (Archives Course – Papers Prepared and Documentation – 1974), vol. 1, pocket 1. Atherton specifically identified as “excellent general texts” two works by T.R. Schellenberg: the chapter in *Modern Archives*, and the 1956 National Archives *Bulletin*. Both are listed as required readings for appraisal within the Archives’ training course, along with Wilfred I. Smith, “Archival Selection: A Canadian View,” *Journal of the Society of Archivists* 3, no. 6 (1967): 275–80. In the latter, Smith provides an excellent summary of PAC’s practices of archival selection in this period, set against the records management context within which they operated.

Equally striking is Atherton's conclusion advocating a cautious approach to preserving historical records that would endure at PAC for many years yet ultimately prove to be unsustainable over the long term:

The basic requirement for selecting sources ... is that the archivist must become fully informed about the history and times to which the holdings relate. This fact cannot be stressed too highly.... He must also, in the final analysis, keep in mind one general rule of thumb: "If in doubt, keep it!" That is, emphasis in an archives should be on retention, not on destruction. In the absence of any valid reason for destroying records, retain them."<sup>50</sup>

As PAC procedures continued to evolve in the 1980s, the appraisal report for textual records retained the three-part memorandum format; however, within the instructions there was an increasing level of detail about methodology and content that demonstrated a growing institutional focus on archival concerns:

The preparation of a written assessment of the archival value of the records ... is the most important role of the archivist.... Therefore it is essential that decisions be *thoroughly documented* and that recommendations are based upon professional judgment and sound [divisional] appraisal criteria. *Detailed and thorough written evaluation* of the archival value of records will assist the Dominion Archivist in deciding whether or not to approve a submitted retention and disposal schedule and also place on file for future reference the reasons for the archivist's recommendations.... [E]nough information [must be included] to permit future reference to the contents of the records without further examination of the records themselves.<sup>51</sup>

A cursory review of the appraisals supporting many of the disposition authorities issued in this period shows that the term "thorough written evaluation" was subject to interpretation. Many appraisals consisted of a few paragraphs, often accompanied by detailed listings or copies of departmentally prepared records schedules, where file blocks were annotated by the archivist as "historical" (or merely labeled either "Keep" or "Destroy"). A further Federal Archives Division (FED) procedural update directed that, in addition to including "enough information" in the formal memorandum (presumably based upon the archivist's judgment of the needs of the particular appraisal situation), "all necessary working papers ... should also be filed ... in order to substantiate FED's recommendations and document the archivist's activities."<sup>52</sup>

Unfortunately, as is often the case with any research activity, while some-

50 Atherton, "The Appraisal of Government Records," 8 (emphasis in original).

51 Public Archives of Canada, Federal Archives Division [hereafter PAC-FED], "Interim update – Procedure Paper B-2 – Procedures for Review of Departmental Submissions," 1 December 1983, Appendix A (emphasis added); copy in author's possession.

52 PAC-FED, "Interim update – Procedure Paper B-2," 5 November 1985, 3; copy in author's possession.

times this additional documentation did make its way onto the FED corporate files for long-term retention and subsequent use, additional valuable information also occasionally remained in the archivist's head. This led to situations where it may have been difficult for the succeeding archivist to fully understand and interpret the appraisal decision that had been made, thus having a significant impact on the future effectiveness of the appraisal decision. How would the succeeding archivist know if the correct records had been identified for transfer to the archives? And how could he or she properly advise government institutions on how to interpret and apply their retention schedules if the supporting rationale was unclear or missing altogether?

While appraisal methods for government textual records were being developed and refined, PAC's Machine Readable Archives Division (MRAD) was developing the means to appraise and acquire new and increasingly important types of government records: computer data files. In 1974, shortly after its establishment, MRAD issued acquisition criteria for determining long-term value.<sup>53</sup> Two years later, an expanded version formed the heart of divisional guidelines that declared that selection "should take into account not only the value of the records for the long-term purpose of government or the department but also their value for much wider research needs."<sup>54</sup> Like textual records archivists, MRAD archivists were directed to follow the values-based model of appraisal, but with an addition: their appraisal procedure manual outlined the conduct not only of contemporary archival appraisal – what was known as "content analysis" – but also *technical* analysis, to address the specific issues and concerns with the new machine-readable format of the records.<sup>55</sup>

John McDonald and Katherine Gavrel revised MRAD's manual in 1981, drawing upon recent developments in the United States with respect to the appraisal of machine-readable records (notably the work of Meyer Fishbein,

53 Public Archives of Canada, Machine Readable Archives Division [hereafter PAC-MRAD], LAC file WMRO 9430-0, vol. 1, "Acquisition Criteria for the Machine Readable Archives," 17 July 1974, 1. To be considered of long-term value during appraisal, machine-readable records had to be used or usable in policy formation; or created for "seminal" study; or created for a study conducted by (a) renowned individual(s); or be of a "nonhousekeeping" nature and could be used for reanalysis.

54 PAC-MRAD, "Guidelines for Selection of Machine-Readable and Related Records for Permanent Preservation," April 1976, 1, LAC file WM 8015-1, vol. 1. Like their counterparts in FED, MRAD archivists did not appear to take into account any of the concerns about the dangers in basing appraisal on the "hypothetical needs of the historian of the future," which had been raised by the Public Records Committee thirty years earlier.

55 The MRA appraisal manual encompassed not only general overviews similar to those found in PRD/FED and the division of appraisal into content and technical analysis; it also included a series of specific questions and answers for classes of records to facilitate both types of analysis for various types of machine-readable records, examples of required documentation, and diagrammatic flowcharts. It also laid out what constituted MRAD's "completed appraisal package," in a fashion similar to PRD's memorandum (PAC-MRAD, "Appraisal," Section 1 "The Appraisal Process," LAC file WMRO 9430-0, vol. 1).

Charles Dollar, and Thomas Elton Brown).<sup>56</sup> The new manual included material on automated office information and the legal value of machine-readable records, and was released publicly as *Appraisal Guidelines in the Machine Readable Archives Division*. Two years later, MRAD director Harold Naugler reinforced the value of these guidelines and gave them further international recognition when he explicitly carried forward much of McDonald and Gavrel's work into his study, *The Archival Appraisal of Machine-Readable Records: A RAMP Study with Guidelines*.<sup>57</sup>

From the standpoint of appraisal techniques, the MRAD *Guidelines* reinforced the close ties between the Canadian and US National Archives and their similar approaches to appraisal. In addition to the depth of their instructions, the *Guidelines* were also notable for the explicit acknowledgement of the importance of consulting records creators (as well as subsequent research users), the requirement to address post-acquisition factors (processing, conservation, access, and servicing) during appraisal, and their wide public dissemination.

But in 1985, the growing PAC involvement with the Deschênes Commission brought to the forefront the need for *all* government records archivists to account formally and carefully for their actions within the records disposition process in an integrated and holistic fashion. The most obvious impact of the Deschênes Commission on the Public Archives was not on the *act* of assessing records, which had long been an essential part of the modern government records archivist's job, but on the *process* of records disposition and the perception of where appraisal fit into that process, as well as the formal acknowledgment that individual archivists must demonstrate that they are accountable for their decisions.

The creation of "Federal Government Textual Records: Appraisal and Selection Criteria – a Guide" in 1985 was a milestone in government records appraisal instruction at PAC.<sup>58</sup> Not only did it "set down in writing the prin-

56 Among the sources that McDonald and Gavrel provided under "References" (p. 11) in the *Manual* were: Meyer Fishbein, "Appraising Information in Machine Language Form," *American Archivist* 35, no. 1 (January 1972): 35–43; Charles Dollar and Thomas Elton Brown, "Appraisal of Machine Readable Records: A Seminar" presented at the 43rd Annual Meeting of the Society of American Archivists, Chicago, 1979; and Charles Dollar, "Appraising Machine Readable Records," paper presented at the 41st Annual Meeting of the Society of American Archivists, Salt Lake City, Utah, 1977. Dollar's later work likely also had an influence: "The Appraisal of Machine Readable Archives," *American Archivist* 41, no. 4 (October 1978): 423–30.

57 Harold Naugler, *The Archival Appraisal of Machine-Readable Records: A RAMP Study with Guidelines* (Paris, 1984), especially Parts I and III, as Naugler noted on p. 4.

58 J.W. O'Brien, "Federal Government Textual Records: Appraisal and Selection Criteria – a Guide," draft document, 10 December 1985, LAC file WM 8015-8, vol. 1. The guide's stated purpose was "to bring together old and new selection principles and to give rise to an up-to-date comprehensive appraisal and selection manual which will keep the best of traditional

ciples and practices”<sup>59</sup> that FED archivists had been using for some time, but it also further explained and contextualized textual government records appraisal from a very practical perspective – almost as if a senior experienced appraisal archivist (which the author was) was having a conversation with a junior colleague to explain how to cope with the inherent tricks and pitfalls of the subjective process of appraisal. This is, in fact, how PAC had dealt with appraisal in the past: through the provision of training sessions, including reviews of existing archival literature on the practice of appraisal, instead of specific written criteria. The 1985 guidelines therefore effectively codified existing practices; they addressed conventional appraisal elements (e.g., the need for broad contextual knowledge of the institution to support analysis, the assessment of primary and secondary values, the impact of physical format, and the assessment of future research use). They also touched on how to deal with records creators (who might not be willing to allow access to records or permit their transfer), the difficulty in tracking down information needed to complete an appraisal, and some methods for keeping abreast of current and future research trends.

FED management supported this endeavour to document the previously implicit workings of appraisal and thereby strengthen the process. In November 1986, just before the merger of the Federal Archives Division and the Machine Readable Archives Division to form a new Government Archives Division (GAD), Terry Cook observed to his FED management colleagues that

... the time for such a reassessment [of the concept and method of appraising and scheduling all government records] is obviously now: as we begin in MRA/FED a new holistic approach to government records irrespective of storage medium ... appraisal and scheduling in future should be driven by concerns for proper archival management rather than information (or records) management. There is a world of difference between the two....<sup>60</sup>

While the fundamental purpose of the program – the identification of archival records – was not really changing, the way that this was expressed within PAC’s supporting policy and procedural documents was. PAC began stating clearly in internal documents that it was moving its focus away from a strictly records management–based approach to government records toward one focused firmly on the identification and acquisition of the archival record. As a result, increasing emphasis was placed on archival appraisals as the

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methods while at the same time take into account new developments in information technology, archival theory and research trends” (p. 3).

59 Ibid., 3.

60 Terry Cook to Eldon Frost, Director FED, Memorandum, “Appraisal of Government Records: MRA/FED – RMMS-AISP: A New Approach,” 20 November 1986, LAC file WM 1135-G2, vol. 15, 1.

basis on which PAC would issue records disposition authorities, rather than as simply the means to complete departmental records schedules by identifying some records as “historical” or archival. PAC management and staff also advised government institutions that they were solely responsible for establishing records schedules, and for approving and applying the retention periods contained therein.

At the same time, the increasing need for formal acknowledgement of the key personnel involved in the archival decision, as well as improved consistency in the structure and contents of appraisal reports, was also recognized. While the divisional procedures in place at the time did require appraisal recommendations to include summaries of all discussions involving PAC and departmental staff, as late as December 1986 the individual textual appraisal archivists who made the recommendations on archival keep/destroy decisions did not actually sign their names to the formal documentation that was submitted to the dominion archivist for approval. Cook had earlier observed that this was a significant lacuna from an accountability perspective: “the report for records schedule/submission is the one area where the accountable archivist & chief do not sign their work.... the schedule of course destroys vast amounts of records as well, yet the principal actors are invisible.”<sup>61</sup> Here, then, might be what others have described as “archival ghosts,” whose quiet and invisible interventions on the archival record can go largely unremarked.<sup>62</sup> Cook recommended that appraisal reports should henceforth be signed by the archivist, the chief, and the division director prior to submission to the dominion archivist for approval. This requirement for formal signatures, which is still in use at LAC today, would, he argued, “reflect reality, give greater accountability, and [en]gender greater pride in one’s work – and thus better work.”<sup>63</sup>

Cook’s argument about the importance of the lack of the individual archivist and chief’s signatures, while valid, should also be considered in light of the context of accountability for disposition decisions that was in place at the time. In essence, the procedural requirement for identifying within the appraisal recommendation all PAC and departmental staff involved could have been interpreted as a group or institutional responsibility for the decisions. As

61 T. Cook to Federal Archives Division Management Committee (FED-DMC), Memorandum, 25 November 1986, LAC file WM 1135-G2, vol. 15.

62 See Tom Nesmith, “Still Fuzzy, But More Accurate: Some Thoughts on the ‘Ghosts’ of Archival Theory,” *Archivaria* 47 (Spring 1999): 136–50. Nesmith’s review article addressed the concept of the “archival ghost” (which was based on Jacques Derrida’s *Specters of Marx: The State of the Debt, the Work of Mourning, and the New International*) and its impact on archival theory. Others have picked up on the “archival ghosts” concept, including Victoria Lemieux, “Let the Ghosts Speak: An Empirical Exploration of the ‘Nature’ of the Record,” *Archivaria* 51 (Spring 2001): 81–111; and Karen Buckley, “‘The Truth is in the Red Files’: An Overview of Archives in Popular Culture,” *Archivaria* 66 (Fall 2008): 95–123.

63 Cook to FED-DMC, Memorandum, 25 November 1986.



the results of the Deschênes Commission demonstrated, however, the increasing emphasis on formal accountability would have significant impact on recordkeeping and archives.

By the time the commission's formal findings were released in late December 1986, it had become clear that neither the earlier selection of "historical records" by senior government officials (records creators), based on their own understanding of what constituted value, nor the more recent focus on facilitating records management was a suitable method for identifying and preserving the Canadian government's archival records. The events surrounding the Deschênes Commission demonstrated that Canadian social activism, wherein citizens question the actions of their government and demand documentary proof of past decisions and actions, was on the rise. With the decision to change the stated goal of its government records program from a records management to an archival focus, an identified need to better codify and explain its appraisal methods, and the identification and documentation of who was specifically responsible for identifying records of archival value, the National Archives and its staff entered into the current era of government accountability and recordkeeping.

### *The era of accountability and recordkeeping (ca. 1990–present)*

Beginning in 1987, a series of significant events strengthened the growing archival focus of Canadian federal government records disposition. From an archival perspective, this era is characterized by the increasing drive for accountability at all points of the appraisal and disposition process, and therefore a corresponding need to rationalize, systematize, and document appraisal decisions that can then be applied on an ongoing basis to identify archival records for long-term preservation.

The *National Archives of Canada Act* granted sole authority for the disposition of government records to the national archivist.<sup>64</sup> This formal legislative declaration of the independent power of the national archivist over government records disposition was immediately followed by internal policy directions from the NA's Historical Resources Branch Management Committee (HRBMC) to ensure that NA operational areas had appropriate selection criteria on which to base their appraisal and acquisition decisions. Observing that appraisal criteria already existed in all of the branch's five divisions (Cartographic and Architectural, Documentary Art and Photography, Government Archives, Manuscript, and Moving Image and Sound Archives),

64 *National Archives of Canada Act*, 1987, Section 5 (1): "No record under the control of a government institution and no ministerial record, whether or not it is surplus property of a government institution, shall be destroyed or disposed of without the consent of the Archivist."

in 1990 the committee directed the development and testing of a common branch-wide format for divisional appraisal guidelines. The resulting comprehensive document, "Appraisal Guidelines in the Historical Resources Branch National Archives of Canada," which contained separate chapters for each of the divisions, was presented to the National Archives of Canada Advisory Board (NACAB) for approval in October 1991 as one of three important documents that would govern the NA's future acquisitions.<sup>65</sup>

GAD's portion of the branch *Guidelines* demonstrated the division's increasing focus on rigour, standardization, and accountability, rather than reliance on decisions based "on traditional practices passed on by senior staff and on general archival theory."<sup>66</sup> The formal introduction of the *Guidelines* was accompanied by a new format for government records appraisals that continued to codify and refine those practices previously imparted through training;<sup>67</sup> both of these elements strengthened existing procedural requirements for detailed appraisal information, as did new internal GAD guidelines on sampling methods for textual records.<sup>68</sup>

65 National Archives of Canada, Historical Resources Branch, "Document 6/91-6b, Appraisal Guidelines/Lignes Directrices d'évaluation," 16 October 1991, 2, LAC file WM 8015-8, vol. 3, pocket. The other two documents were the NA's "Acquisition Policy," approved by the National Archivist on 8 March 1988 (LAC file WM 8015-1, vol. 5), and the "Acquisition Strategy: A Development Plan, 1989-1993" (LAC file WM 8015-8, vol. 3, pocket). The Acquisition Policy, prepared in part in response to the 1983 recommendations of the Auditor General of Canada that the Public Archives of Canada needed to have a formal acquisition policy and define the term "national significance," stated that the National Archives would "develop a broad and comprehensive collection by acquiring records of national significance in a planned and integrated manner, according to predetermined appraisal criteria" (p. 2). In turn, the covering memorandum introducing the appraisal criteria to the NACAB observed that "these criteria show archivists how to relate the relevance of particular records to the departmental acquisition policy."

66 J.W. O'Brien, "Government Archives Division Guidelines on Appraisal" (September 1990), 1, LAC file WMRO 9430-0, vol. 2; see also National Archives of Canada, Historical Resources Branch, "Appraisal Guidelines in the Historical Resources Branch National Archives of Canada, Completed Version" (December 1991), Chapter V – Government Archives Division – Guidelines on Appraisal, 1, LAC file WM 8015-8, vol. 3, pocket. O'Brien also referred to the impact of new legislation and policies: the *Access to Information* and *Privacy Acts* that were introduced in 1983; the *National Archives of Canada Act* (1987) that doubled the number of government institutions required to seek formal records disposition authority from the National Archivist before disposing of records in any media; and the implementation of the TBS *Management of Government Information Holdings* policy (1989).

67 "Report and Recommendations of the Work Group on Requirements of Submissions, Archival Appraisal and Authorities," November 1990, LAC file WM 6235-0, vol. 2.

68 Tom Nesmith, "Sampling Textual Records in the Government Archives Division, National Archives of Canada," August 1990, LAC file WMRO 9430-0, vol. 2. See also Terry Cook, "The Appraisal of Case Files: Sampling and Selection Guidelines for the Government Archives Division, National Archives of Canada," 24 September 1992 [LAC file WMRO 9430-0, vol. 3], which was based in part on Nesmith's report; and Cook, "Many are

In addition to taking concrete steps to improve its appraisal documentation, the Archives undertook a number of other practical measures to bolster its government record disposition program, including making direct linkages between the records acquired by the Archives as holdings and the appraisal and disposition authority that had identified them for transfer; introducing a planned and coordinated approach to disposition (rather than continuing to use the past method of responding in a piecemeal and ad hoc fashion that most often corresponded to departmental space concerns);<sup>69</sup> and affirming that it is the responsibility of creating institutions, not the Archives, to set retention periods on their records that reflect the institution's long-term operational and legal needs.

But the biggest step taken toward the improvement of archival appraisal techniques at the National Archives was the introduction of macroappraisal in 1990. In terms of the evolution of instructions to archivists on the practice of appraisal and the preparation of its documentation, it is sufficient to say that between 1991 and 2000 the National Archives was in a state of ongoing refinement. Throughout that period, many NA archivists practising macroappraisal shared their practical experiences with the wider archival community in a fashion that some consider unusually open and frank. Through international and national archival literature<sup>70</sup> and conference presentations, these archivists engaged in open discussions and ongoing critical analysis of the methodology

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Called but Few are Chosen': Appraisal Guidelines for Sampling and Selecting Case Files," *Archivaria* 32 (Summer 1991): 25–50.

69 For a comprehensive summary of the initial practical implementation of macroappraisal and the planned approach to disposition (current only to 1994), see Bruce Wilson, "Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada," *Archivaria* 38 (Fall 1994): 218–31.

70 There is an extensive literature on the history, development, and practice of macroappraisal. In addition to the references provided in note 3 above (regarding the history of macroappraisal's development and some recent practitioners' perspectives), there is a brief summary of some of the literature that has contributed to the development of macroappraisal methodology in note 1 of Bailey, "Turning Macro-appraisal Decisions into Archival Holdings." Additional examples of pre-2000 National Archives staff contributions to the development of macroappraisal (identified as "appraisal case studies" in the document "Appraisal Methodology: Macro-Appraisal and Functional Analysis Part B: Guidelines for Performing an Archival Appraisal on Government Records" [October 2001] in note 73 below) include: Brian P.N. Beaven, "Macro-Appraisal: From Theory to Practice," *Archivaria* 48 (Fall 1999): 154–98; Jim Burant, "Ephemera, Archives, and Another View of History," *Archivaria* 40 (Fall 1995): 189–98; Candace Loewen, "From Human Neglect to Planetary Survival: New Approaches to the Appraisal of Environmental Records," *Archivaria* 33 (Winter 1991–92): 87–103; Jean-Stéphen Piché and Sheila Powell, "Counting Archives In: The Appraisal of the 1991 Census of Canada," *Archivaria* 45 (Spring 1998): 27–43; Sheila Powell, "Archival Reappraisal: The Immigration Case Files," *Archivaria* 33 (Winter 1991–92): 104–16; and Ellen Scheinberg, "Case File Theory: Does It Work in Practice?," *Archivaria* 38 (Fall 1994): 45–60. Critical analysis did not stop in 2005–6; see Jill Delaney, "An Inconvenient Truth? Scientific Photography and Archival Ambivalence," *Archivaria* 65 (Spring 2008): 75–95. Delaney touches on the question of the applicability of macroappraisal to non-textual records.

and its underpinnings, including both its successes and its limitations;<sup>71</sup> those discussions in turn fed internal redevelopment processes.

In terms of appraisal documentation, it took over ten years of actually practising macroappraisal before the National Archives created a formal, integrated suite of procedural documents that outlined the Archives' structured appraisal methodology for government records.<sup>72</sup> During this decade, many of the discussions and refinements of key concepts found in this methodological suite were either proposed or examined/tested through NA staff contributions to international archival literature and conferences, as mentioned above. The approved methodological suite, which is still partially in use at Library and Archives Canada today, was intended "to provide an appraisal rationale and methodology for archivists" and to "encourage greater intellectual consistency in records disposition decision-making and in the logic of its explanation and presentation in Appraisal Reports (AR)."<sup>73</sup>

The merger in 2004 of the National Archives and National Library to form Library and Archives Canada had a profound impact on the resulting institution's mandate, programs, and internal organization. Not only did the new Act include significant new powers for the librarian and archivist that would affect government records appraisal,<sup>74</sup> but the operational context in

- 71 For a recent, contrasting management perspective of this period of macroappraisal, see Daniel J. Caron, "Reflections on the Evolution of Appraisal at Library and Archives Canada: From Content to Context to Content Through Context," speech to the National Archives of the Netherlands," 6 July 2011, <http://www.bac-lac.gc.ca/eng/news/speeches/Pages/reflections-evolution-appraisal-lac.aspx> (accessed 5 October 2012). Unfortunately, as this is a presentation text, there are no source citations given for the various points raised about macroappraisal's evolution and implementation.
- 72 Beginning in 1997, the National Archives significantly recast and recodified its macro-appraisal methodology, in part to incorporate the practical experience gained by archivists since 1991, and in part to bring practice closer to theoretical precepts, some of which had been discussed in the published literature. The resulting integrated suite of documents outlining the structured appraisal methodology was developed in 2000 and officially adopted in 2001, and can still be found on the Library and Archives Canada website at <http://www.collectionscanada.gc.ca/government/disposition/007007-1034-e.html> (accessed 19 September 2011).
- 73 LAC, "Appraisal Methodology: Macro-Appraisal and Functional Analysis Part A: Concepts and Theory" (Terry Cook, principal author), 1, LAC file WMRO 6243-0, vol. 1, and <http://www.collectionscanada.gc.ca/government/disposition/007007-1035-e.html> (accessed 15 July 2011). The other parts of this approved methodology were "Part B: Guidelines for Performing an Archival Appraisal on Government Records" (October 2001) on LAC file WMRO 6243-0, vol. 1, and <http://www.collectionscanada.gc.ca/government/disposition/007007-1041-e.html> (accessed 15 July 2011); and "Drafting an Appraisal Report for the Disposition of Government Records" (February 2001), LAC file WMRO 6243-0, vol. 1.
- 74 *Library and Archives of Canada Act*, 2004, <http://laws.justice.gc.ca/eng/acts/L-7.7/FullText.html> (accessed 14 April 2012). Key new powers from a government records appraisal and acquisition perspective were "sampling from Internet" (section 8(2)) and "government records at risk" (section 13(3)).

which archival appraisal was conducted continued to evolve, as did the federal government recordkeeping environment. To address these changes, LAC continued to refine its appraisal techniques and tools for disposition<sup>75</sup> while, at the same time, taking a far more active role to support Treasury Board's efforts to change the way that government information resources are created and maintained. These activities were an effort to ensure greater transparency for all federal government activities that is engendered by the concepts of government's accountability to its citizens, as well as modern comptrollership.

Briefly, the Canadian government's expectations of good public service are now expressed in the Treasury Board Secretariat's (TBS) Management Accountability Framework (MAF),<sup>76</sup> which is supported by the *Policy on Management, Resources and Results Structures* (MRRS), a standard structure for all departments to report to Parliament and Canadians on the alignment of their resources, program activities, and results.<sup>77</sup> In addition to the development of its MAF, Treasury Board took further steps to reinforce a strong information management environment to support recordkeeping into the future. A new *Policy on Information Management* went into effect on 1 July 2007 to support efficient and effective information management.<sup>78</sup> Under this policy, and within the context of MAF, LAC also stepped forward to spearhead the development of a new regulatory framework for government recordkeeping. The result of those efforts was the TBS *Directive on Recordkeeping*, which went into effect on 1 June 2009.

75 For example, in 2004 new guidelines were issued for the creation of terms and conditions for the transfer of archival records through a Records Disposition Authority. See Beaven, "But am I getting my records?" and Bailey, "Turning Macro-appraisal Decisions into Archival Holdings."

76 The Treasury Board's Management Accountability Framework (MAF) was launched in the summer of 2003. Intended to translate the vision of modern public service that was expressed within the document *Results for Canadians: A Management Framework for the Government of Canada* (2000) ([http://www.tbs-sct.gc.ca/report/res\\_can/rc-eng.asp](http://www.tbs-sct.gc.ca/report/res_can/rc-eng.asp), accessed 15 July 2011) into an integrated framework that outlined TBS's formal expectations of senior public service managers for good public service management, the MAF brings together key elements of modern management, such as modern comptrollership, service improvement, human resources modernization, as well as the Government On-Line initiative. MAF comprises ten key elements that, collectively, both define "management" and establish the expectations for good management of a department or agency.

77 The three key components of the *Policy on Management, Resources and Results Structure* (MRRS) (2005 and 2010) are Strategic Outcomes (SO); a Program Activity Architecture (PAA); and a Governance Structure (GS); see <http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=18218&section=text> (accessed 15 July 2011).

78 Treasury Board Secretariat, *Policy on Information Management*, <http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12742> (accessed 19 September 2011). The policy's stated objective was "to achieve efficient and effective information management to support program and service delivery; foster informed decision making; facilitate accountability, transparency, and collaboration; and preserve and ensure access to information and records for the benefit of present and future generations."

From a government archival appraisal perspective, the increased emphasis in the Government of Canada on management accountability since 2003, the requirement to report results against specifically targeted elements of good management, and the implementation of a recordkeeping regime supported by a comprehensive recordkeeping directive were all very positive developments for macroappraisal. In this environment, government institutions are required to create, as part of their regular business activities, all of the basic contextual information and analysis in relation to business processes that an archivist requires to conduct initial macroappraisal research and subsequently identify archival records for transfer and preservation. Furthermore, the information's structure (relation to business process and activity) largely dovetails with the requirements for conducting macroappraisal's functional analysis, regardless of the fact that the impetus behind MAF documentation is not archival appraisal but accountability for public funding.<sup>79</sup> Finally, under Section 6.1.3 of the *Directive on Recordkeeping*, all government institutions are required to establish and implement key methodologies, mechanisms, and tools to support departmental recordkeeping requirements throughout the information life cycle, including information resource repositories, taxonomies or classification systems, and retention periods. Institutions must also create and implement regular disposition activities, and document their processes.<sup>80</sup>

Arguably, the macroappraisal initiative of a planned disposition program, as launched in 1990, was only really tenable when government recordkeeping had achieved full integration with management accountability. With the Management Accountability Framework and the *Directive on Recordkeeping* providing policy support throughout the Government of Canada, and after practising and refining macroappraisal methodology for nearly twenty years, Library and Archives Canada was now ready to embark on a new phase in which there was a concentrated effort to work more actively, closely, and directly with government institutions, with a newly revised and strengthened macroappraisal methodology.

Following the appointment of Librarian and Archivist Daniel J. Caron in 2009, LAC also embarked upon a comprehensive "Modernization" exercise, intended to transform LAC "from an institution that gave priority to the acquisition and preservation of analogue materials ... while providing limited

79 Catherine Bailey, "The Government of Canada's Management Accountability Framework and Macroappraisal Research," internal Library and Archives Canada research paper, February 2011, LAC file LAC 6235-43, vol. 1. See also Catherine Bailey, "Establishing an Accountability Framework: Macroappraisal in the Canadian Federal Government Context," in *Proceedings of the International Conference on Records and Archives, "Power of Collective Memories and Evidence,"* Singapore, 17–18 July 2008, 93–106 (especially pp. 100–1, 103).

80 Treasury Board Secretariat, *Directive on Recordkeeping*, section 6.1.3, <http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?section=text&id=16552> (accessed 19 September 2011).

access to these collections, to an institution that promotes open access to Canada's documentary heritage for all."<sup>81</sup>

A series of modernization initiatives began with the development of two draft strategic documents. One was an integrated "Documentary Heritage Management Framework" consisting of three business pillars (Acquisition, Preservation, and Resource Discovery), each supported by four "Guiding Principles" for LAC acquisition (Significance, Sufficiency, Sustainability, and Society), which were expressed more fully in the second document, the "Acquisition Orientation Instrument."<sup>82</sup> The intent of these documents was to

81 LAC, "Modernization Overview," <http://www.bac-lac.gc.ca/eng/about-us/modernization/Pages/default.aspx> (accessed 5 October 2012). It is important to note that the term "documentary heritage" is defined by the *Library and Archives of Canada Act* as "publications and records of interest to Canada." LAC Modernization is guided by five "key principles": using "a more collaborative approach to fulfil its mandate"; "redefining how [LAC] selects items to be acquired, based on how well they represent the whole of Canadian society"; "improving access to its holdings, by making descriptions simpler and more relevant"; "ensuring digital as well as analogue preservation"; and "building its capacity to manage and fully carry out its mandate" (<http://www.bac-lac.gc.ca/eng/about-us/modernization/Pages/Principles.aspx>, accessed 14 April and 5 October 2012). "Key documents for Modernization" are located on the LAC website at <http://www.bac-lac.gc.ca/eng/about-us/modernization/Pages/Key-Documents.aspx?selected=1.4> and include the following (all documents accessed 8 March and 5 October 2012):

- Daniel J. Caron, "Recordkeeping as a Pillar of Public Memory, Accountability, and Administration: The Canadian Experience," speech given to the Canada-Japan Symposium on e-Government Document Management, National Libraries and Archives: Building New Frameworks to Preserve and Disseminate Intellectual Assets, 2 February 2011;
- Daniel J. Caron, "Digital Archives or Archives in a Digital World: To Be or Not to Be," presentation at the University and Research Institution Archives Conference, University of Alberta, Edmonton, 12 July 2011;
- Daniel J. Caron, "Leaving the Cathedral and Entering the Bazaar: Library and Archives Canada Engages Canada's Digital Society," presentation to the Association of Computing Machinery and Institute of Electrical and Electronics Engineers (ACM/IEEE) Joint Conference on Digital Libraries, Ottawa, 14 June 2011; and
- Daniel J. Caron, "The Documentary Moment in the Digital Age: Establishing New Value Propositions for Public Memory," keynote address at the Association of Canadian Archivists' 35th Annual Conference (Halifax, 10 June 2010), which was subsequently revised and published as Daniel J. Caron and Richard Brown, "The Documentary Moment in the Digital Age: Establishing New Value Propositions for Public Memory," *Archivaria* 71 (Spring 2011): 1–20.

82 See LAC, *Documentary Heritage Management Framework* (<http://www.collectionscanada.gc.ca/modernization/012004-2010-e.html>, accessed 19 September 2011) and LAC, *Acquisition Orientation Instrument* (<http://www.collectionscanada.gc.ca/modernization/012004-2021-e.html>, accessed 19 September 2011). These two draft documents were later removed from the LAC website; copies can be viewed at the Internet Archive, <http://web.archive.org/web/20091124014438/http://www.collectionscanada.gc.ca/modernization/012004-2010-e.html> and <http://web.archive.org/web/20091124014449/http://www.collectionscanada.gc.ca/modernization/012004-2021-e.html>, respectively (both accessed 9 March and 5 October 2012). A fifth Guiding Principle – Suitability – was later added to the

create a systematic approach to the acquisition of documentary heritage material that was based on standardized criteria and understandings as well as professional judgment.

Shortly after the release of these two draft strategic documents, LAC's Government Records Branch established a Macroappraisal Methodology Review Working Group to review and revise where necessary the existing macroappraisal principles and methodology. Working between January and April 2010, and in keeping with LAC's recent policy renewal initiative, the group proposed a new suite of instruments that could guide a renewed and modernized approach to government records appraisal. The proposed policy suite was intended to ensure a consistent, harmonized approach to the appraisal of government records, using a refined and renewed macroappraisal methodology, in order to comply with the disposition requirements stated in Section 12(1) of the *Library and Archives of Canada Act*.<sup>83</sup>

In order to complement the new *Directive on Recordkeeping* and take a much more proactive role in Government of Canada recordkeeping, LAC also began developing additional policy-based instruments to guide its acquisition decisions across the institution, based on common understandings and consistent application of its new "Guiding Principles." The intent was that these new instruments would enable a more systematic approach to decision-making and its documentation. LAC also embarked on a revised government disposition and recordkeeping program intended to align Management Accountability Framework requirements, the objectives of the *LAC Act*, and the requirements of the *Directive on Recordkeeping* within a "whole of society/whole of government" context.<sup>84</sup> LAC also took a further policy decision to base its govern-

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model as LAC developed its stakeholder relations framework.

83 The Macroappraisal Methodology Review Working Group produced internal consultation drafts of a "Policy on Government Records Appraisal" and a "Directive on Macroappraisal" in April 2010. The third proposed document, "Guidelines for the Archival Appraisal of Government Records," was not created owing to the further development of a more comprehensive LAC appraisal and acquisition strategy based on a "Whole-of-society" model that was to be supported by a new Recordkeeping Methodology, version 1 of which was developed between September 2010 and April 2011. However, many of the results of the working group's internal review and analysis have since been revised and incorporated by group members into subsequent Modernization initiatives.

84 Beginning with the document *Canada's Performance 2002*, the Government of Canada adopted a common, government-wide approach to the collection, management, and reporting of financial and non-financial information on program objectives, performance, and results in order to report to Parliament and Canadians. This *Whole-of-Government Framework* (WoGF), which groups more than 200 government Strategic Outcomes and over 400 Program Activities, is fully supported by the TB *Policy on Management, Resources and Results Structures*. As explained on the TBS website, the framework "maps the financial and non-financial contributions of departments, agencies, and Crown corporations receiving appropriations to a set of 16 high-level Government of Canada outcome areas within four Government of Canada spending areas – Economic, Social, International, and Government



ment appraisal work on an institution's required Program Activity Architecture (PAA), thus codifying and regulating the frame of reference for the functional analysis that Cook called for in his original formulation of macroappraisal.

In very broad terms, LAC's developing "Whole-of-society" documentation strategy, based on societal domain analysis, is intended to establish a common framework across LAC for the appraisal and acquisition of documentary heritage material in all formats, including published and unpublished material, and government and private records. This approach requires LAC to readjust and clarify what it wants to document about Canadian society, and to broaden the context in which all appraisal and acquisition decisions are made, and the justifications for those decisions. From the perspective of government records archivists, the development of common guiding principles for appraisal and acquisition, and the development of a whole-of-society/whole-of-government model in which they are applied, means that concepts that were implicit within macroappraisal (e.g., societal significance; sufficiency and sustainability; assessment within the broader frame of the universe of published and unpublished information resources in all formats; and the distinction between appraisal and acquisition) are now addressed explicitly in the documentation that supports decisions taken on the archival value of records. What still remains to be seen, however, is how these advances will affect the final shape, structure, and impact of any new instructions to archivists on how to conduct archival appraisal of government records at LAC from this time forward.

### ***Where do we go from here?***

As interesting as this examination of the history of Canadian federal records disposition may be, what does it tell us? The short answer is that this examination provides evidence that comprises part of a foundation on which the future development of appraisal practices should rest. Such evidence, combined with the results of practical, hands-on experience, can lead to advances in appraisal methodology that will help ensure the production of effective appraisal decisions (and documentation) that can be applied to government records long after they are made, to ensure the identification of the best archival records for long-term preservation.

Yet at this juncture, there are two additional steps on the path toward achieving those future methodological developments. The first step is theoretical: to conceptualize what *should* be the essential elements for archiv-

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Affairs" (*Whole-of-Government Framework: Background*, <http://www.tbs-sct.gc.ca/ppg-cpr/frame-cadre-eng.aspx>, accessed 15 July 2011). For information on the Whole-of-society approach, see Library and Archives Canada, *2012–2013 Report on Plans and Priorities*, especially pp. 7, 9 and 23, at <http://www.tbs-sct.gc.ca/rpp/2012-2013/inst/bal/bal-eng.pdf> (accessed 14 April and 5 October 2012).

al appraisal documentation. This conceptualization of some fundamental elements of government records appraisal and documentation appears below, in Section II.

However, as concepts and models must be applied in the real world, the second step is to conduct further critical analysis, both to test the conceptualization and to assess the “effectiveness” over time of the appraisals and disposition instruments already produced during the three historical eras presented above. From this second step will come additional operational elements that should be included in future disposition instruments. While some of this analysis has been conducted in the past,<sup>85</sup> additional up-to-date research is required before any conclusions can be drawn.

## II. A Conceptual View of Modern Government Records Appraisal – Essential Elements

### *Appraisal in a government setting: The need for a pragmatic balance*

As social agents that select and preserve records and recommend disposal, archivists have a significant responsibility to the society in which they live and work. Terry Cook put it very well when describing the impact of the Deschênes Commission:

85 The best-known Canadian study is Bryan Corbett and Eldon Frost, “The Acquisition of Federal Government Records: Report on Records Management and Archival Practices,” *Archivaria* 17 (Winter 1983–84): 201–32. As the editor’s preface notes, this abridged version of the 1979 internal PAC study was based on “many months of research, case studies, and interviews,” which presented a snapshot of the archives–records management partnership fourteen years after the implementation of the *Public Records Order*. Frost went on to update what is known familiarly as the “Corbett-Frost Report” with his article “A Weak Link in the Chain: Records Scheduling as a Source of Archival Acquisition,” *Archivaria* 33 (Winter 1991–92): 78–86. In it, he noted that the original 1979 study “indicated, rather conclusively, that the scheduling of federal government textual records had failed dismally as a means of identifying and preserving archival material” (p. 80). Auditor General of Canada Sheila Fraser also critically examined the effectiveness of the records disposition authorities program in her 2003 report to Parliament (“Chapter 6 – Protection of Cultural Heritage in the Federal Government,” [http://www.oag-bvg.gc.ca/internet/English/parl\\_oag\\_200311\\_06\\_e\\_12929.html#ch6hd4c](http://www.oag-bvg.gc.ca/internet/English/parl_oag_200311_06_e_12929.html#ch6hd4c), accessed 8 October 2012). However, Corbett and Frost examined the effectiveness of Canadian federal records scheduling within a different legal and policy framework (i.e., prior to and shortly after the enactment of the *National Archives of Canada Act* in 1987), and the Auditor General conducted her review in 2003 prior to the enactment of the *Library and Archives of Canada Act* that combined the National Archives and the National Library. This existing research, while valuable from a historical perspective, needs to be supplemented by a similar study conducted within the current legal and policy framework (i.e., the *LAC Act*, the Management Accountability Framework, and the TBS *Directive on Recordkeeping*).

Archives are not merely scholarly playgrounds for their staff and researchers; they can also be active agents of political accountability, social memory, and national identity. And what documents the archives chooses to keep or destroy (or lose as “missing”) are not simply the result of dispassionate historical research or bureaucratic processes, but rather of sensitive, sometimes controversial acts for which archives can be held accountable in courts of law and in the court of public opinion.<sup>86</sup>

As citizens increasingly demand to know more about how their government and its agents are carrying out its responsibilities (especially when scandals come to light), not only do they want to know exactly how and why the government did something, but they also want to see the proof for themselves. The proof they seek is generally found in records or, conversely, in the lack of records. Governments often respond to scandals by taking steps to increase their accountability and transparency, especially with respect to recordkeeping; archivists, particularly those working in government archives are, in turn, required to become more accountable for their conduct in performing archival appraisal and other related activities.<sup>87</sup>

However, the sheer volume of information created since the Second World War, particularly in the current era of the overabundance of digital information, means that government records *must* continue to be appraised, and those of archival (enduring) value to society need to be identified and selected from the broader mass of documentation. Following from this premise is the further observation that archival appraisal in a government context is always a balance between the need for intellectual rigour, based on theory and methodology,

86 Cook, “A Monumental Blunder,” 38–39.

87 A rich archival literature has explored the concept of accountability in archives over the past two decades. Of particular note are the essays in Cox and Wallace’s *Archives and the Public Good: Accountability and Records in Modern Society*, as well as the editors’ introduction. In the specific context of LAC and its predecessors, it is important to note the policy statement “Preserving the Archival and Historical Memory of Government,” <http://www.collectionscanada.gc.ca/government/disposition/007007-1042-e.html> (accessed 23 June 2011). This statement was preceded by Ian E. Wilson’s article “The Fine Art of Destruction Revisited,” *Archivaria* 49 (Spring 2000): 124–39. Originally a speech presented to participants in “Destruction of Records and Proposed Access Act Amendments: A One-Day Seminar and Training Session” on 1 May 2000, it is found in its original form on the LAC website at <http://www.collectionscanada.gc.ca/government/news-events/007001-3004-e.html> (accessed 23 June 2011). As Wilson put it, “Given this new information culture and growing public demand for access to information resources, it is critical that government has a comprehensive audit trail of decision making which fully addresses these concerns, especially in relation to information disposal.... Our approach requires a very detailed explanation and documentation of the procedures undertaken by the National Archives to establish the archival value of government records, not only to ensure that the rationale for every archival decision is clear and recorded, but also to ensure that the reasons supporting the decisions form part of the future archival record of government itself” (“The Fine Art of Destruction Revisited,” 131, 134).

and pragmatism (the requirement for an appraisal process that will produce required disposition instruments and tools in a timely fashion in order to meet client needs).

### *Principles of appraisal as applied to government records*

I believe that the intersection of these three overarching factors – the requirement to be accountable to society, the overabundance of government information from which archivists must select records of archival value for long-term preservation, and the need for a pragmatic approach to the appraisal process – allows for the expression of ten basic principles of government records appraisal, many of which may contain elements already familiar to archivists.<sup>88</sup>

1. The purpose of archival appraisal is to identify a sufficient subset of records, regardless of medium, that are of enough significance to a society collectively that they are considered to have archival (enduring) value and should therefore be preserved over the long term.
2. There is a distinction between appraisal (the determination of archival or enduring value based on stated principles and defined methodology) and acquisition (an often pragmatic institutional decision to acquire records or not, based on the resources necessary to sustain the records over the long term or on any substantiated sponsor or stakeholder concerns).
3. Archival appraisal should be a proactive, planned process that is aligned with broader institutional acquisition principles and strategies, and that maintains a consistent methodological approach over the long term, rather than focusing on immediate or anticipated research use.

88 My articulation of these principles is strongly rooted in the work of LAC's Macroappraisal Methodology Review Working Group (introduced in note 83 above), which I had the pleasure to chair. I am indebted to my fellow group members Brian Beaven, Jana Buhlmann, Michael Dufresne, Jon Fotheringham, Roderick McFall, Marissa Paron, David Rajotte, Jenna Smith, and Jennifer Wilhelm for the critical analysis and passionate discussion that led to the initial establishment of two sets of principles for government records appraisal and macroappraisal, which were presented in the consultation draft documents in April 2010. These documents significantly informed my subsequent analysis of the overall process of government records appraisal in the context of a modernized LAC approach to appraisal and acquisition, and thus the expression of the principles found here. I would also suggest that it can be argued that many of these principles *could* be applied (perhaps with slight modifications) to the appraisal of records created by private creators, within a whole-of-society approach such as the one presently being developed at LAC.

4. Archivists – not researchers or creators – are society’s professional agents, often appointed by law to form its collective memory. As such, archivists determine archival or enduring value within the societal context.
5. Appraisal should identify records that demonstrate how the state governs society and, in turn, how society and its individual citizens respond to the state. Appraisal decisions should therefore be created with sufficient rigour and clarity of expression that they can be applied over the long term to identify records that will document the evolution of this society–state relationship over time.
6. “Micro-appraisal” (the review of records) is a critical step in validating and verifying any appraisal strategy or methodology. Therefore, archival decisions resulting from broadly based appraisal strategies (e.g., macroappraisal) are only valid once confirmed by a review of actual records at whatever level of detail they may warrant or resources may permit.
7. Archival selections arising from appraisal must be expressed in a fashion that permits their practical and accurate application to records by any creating institution to which the archives delegates responsibility for disposition actions.
8. The appraisal strategy(ies) and methodology(ies) that support and direct a records disposition program, as well as every recommendation regarding the archival value/transfer of government records that results from the process, must have a strong research base and a complete and well-documented supporting rationale.
9. At the foundation of appraisal is the obligation to provide an open, transparent, and defensible account of what was selected for retention. Therefore, information necessary to document decisions on the archival value of government records must be retained in the archival institution’s recordkeeping system for the purpose of accountability.
10. Archival appraisal requires regular reviews of its methodological underpinnings. This includes monitoring appraisal decisions and revisiting the archival institution’s collection for the management of legacy records.

With these principles in mind, a government records archivist can turn his or her attention to the actual process of appraising records.

### *Key concepts for the appraisal process*

First and foremost, it is important to recognize (and sometimes to reiterate) that all archival appraisal decisions are by their very nature subjective, no matter how many attempts are made to objectify the process through the use of common methodology or to base them on scientific methods. What is essential from the perspective of archival appraisal as a process is that archivists should clearly present their appraisal analysis in written form, along with all of its supporting information, so that readers examining this record of decision may have a thorough understanding as to *how* and *why* the decision about the archival value of the records was reached, even if the decision itself is questioned in the future, perhaps because records no longer exist.

Therefore, to be truly effective, regardless of any specific institutional setting, the archival appraisal process and its products must be as transparent and open as possible. Transparency must, however, be considered within the appropriate legal and policy limits prescribed by the society in which the appraisal is conducted. For example, it may not always be possible for archivists to produce fully transparent, publicly available documentation on decisions made about records affecting national security, or on information subject to access to information and privacy restrictions.<sup>89</sup>

Related to this, archivists must be fully and constantly aware that there are multiple audiences for their analysis/reports, both internal and external to the institution, and that not all of those audiences will have the same specialized knowledge of records or the process as the archivist(s) performing the appraisal. This observation was actually eloquently stated at the National Archives when instructions were issued in 1997 for the appraisal of government visual and sound records. Archivists were warned “never [to] assume that anyone reading the appraisal report, now or in the future, will automatically know why records should be acquired by the NA,” and were advised that all of their appraisal decisions had to be “adequately argued and documented.”<sup>90</sup>

89 The concept of transparency of archival appraisal decisions also raises additional issues that would require another paper to address completely. These issues include, but are not limited to, the following questions: Should the background and skills of archivists themselves be made an explicit part of the appraisal documentation? Should appraisal recommendations or decisions be presented to the general public through a formal consultation process? Should such a process be proactive (e.g., where an archives publicly posts its appraisal recommendations and solicits comment, as is presently the case in New Zealand and the United States), or reactive (e.g., where members of the public must request the recommendation documentation from the archives, perhaps through an access-to-information request, and the archives responds to comments, as is currently the case in Canada)? Should consultation be carried out before, during, or after decisions are approved by the archival authority? What is the impact of such consultation and transparency on the process of appraisal itself; does it cause archivists to “self-edit” their analysis and decisions for posterity?

90 National Archives of Canada, “Guidelines for the Appraisal of Government Media Records

In order to be fully effective, then, disposition instruments and any related (supporting) documentation and tools that arise from the appraisal process and the principles outlined above must also adhere to the principle of clarity of language. There should not be excessive amounts of specialized and/or technical language that cannot be understood by all audiences without active assistance or intervention by the archivist or other specialist. If such specialized language is required for effective decision-making, it must be properly contextualized or defined within the document itself.

The archival appraisal process within any given archival institution also needs to be consistent in three other respects:

- **Consistency of analysis:** archivists conducting appraisals should be using the same approved methodology, in the same fashion, regardless of the specific appraisal circumstances.
- **Consistency of decision-making:** the application of accepted appraisal criteria through the common process of analysis will result in similar decisions made on similar records.
- **Consistency of the application of decisions:** once appraisal decisions are made and approved, they should be carried out in a similar fashion across the archival institution.

The latter two elements require an archival institution to have policies/procedures and tools (above and beyond any professionally based archival appraisal methodology and/or criteria), as well as a management infrastructure that is prepared to direct and, if necessary, *enforce* the institution's accepted appraisal approach and the decisions that result from it.

Together, all of these principles and concepts are essential to the maintenance of an archival institution that can demonstrate an evidence-based approach to its decision-making and thus its societal accountability.

#### ***Four core components of archival appraisal documentation***

There are two important elements for any documentation of an archival appraisal decision. One is that there must be a stated appraisal methodology or framework, adopted by the archival institution within which the archivist works. This methodology should be grounded in clearly worded archival theoretical principles and be itself documented and made available for perusal/consultation by the society as a whole. The second element is that there should

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Prepared by: Records Disposition Division and Visual and Sound Archives Division" (December 1997), 3, LAC file WM 6243-1, vol. 23. The same instructions went on to explain that explicit appraisal documentation was valuable "in order for the NA to track its own history of appraisal; we as an institution must document, for our fundamental accountability to society, why we retain certain records and not others. We also need to document, for our own use, as well as that of our successors, how our approaches to appraisal have changed over the years."

be a common method of documenting the appraisal process so that despite the differences that might exist between different appraisal targets, the key information necessary to support any appraisal recommendation can always be found. Taken together, these two elements provide an archival institution with credibility with respect to archival theory and practice.

To be fully effective, archival appraisal documentation must also demonstrate the results of archival research and analysis over time and space, independent of further intervention from the original appraising archivist(s). Any form of documentation supporting an appraisal decision should therefore comprise four core components, broadly conceptualized as follows:

**Context:** An explanation of the long-term and strategic factors that affect the evaluation of the records, most notably the society and governmental structure within which the records are created; the nature of the activity(ies) that result in the creation of records; the interrelationship of those activities/creators with other activities/creators; and the archival theory/methodology used to identify records of archival value. These are the long-term societal factors that change slowly.

**Description:** An overview of the nature and contents of the information resource universe from which records of archival value will be identified for long-term preservation – in other words, everything that was available to archivists when they identified and selected the subset that had archival value.

These two elements provide the foundation for:

**Analysis:** A complete summary of the appraisal (evaluation) process that resulted in the identification of records of archival value. This analysis must be able to demonstrate, on its own merits and without significant or sustained reliance on external sources or separate specialized knowledge on the part of the reader, why some records were determined to be more important than others, and therefore why the decision was made to preserve some and not others. This is the heart of the entire accountability process and it is essential; someone might question the decision later, but if the analysis is documented appropriately, it will be clear exactly how and why the archivists reached the conclusions that they did.

The text of any analysis on which any archival disposition decision is based should consist of, at a minimum:

- a brief summary description of the activity that creates records, and the context in which it operates;
- a description of the types of records that are created, with sufficient detail that specific groupings of records can be identified for the purposes of disposition; and
- an assessment of the relative value of those records according to the precepts and instructions of all of the archives' theoretical and methodological documents.



This analysis thus leads directly to:

**Decision:** A complete and clear statement that identifies what records are of archival value and will therefore be preserved by the archives over the long term. Any decision statement must be understandable, unambiguous and applicable by anyone responsible for its application.

For clarity of future application and accountability, statements of records that are *not* of archival value and are therefore authorized for disposal by the creating institution should also be included, along with any other relevant information as to how this recommendation should be reflected in any tools provided to institutions in order to facilitate disposition.

For full accountability, various layers of analysis must be documented in an appropriate fashion, as together they demonstrate the true evolution of the appraisal decision over time and space.<sup>91</sup> But it is equally important to reiterate that appraisal of government records is a pragmatic balance; the need to include context, description, analysis, and decision as core components in written appraisal documentation does not in turn dictate any operational requirement to create large amounts of documentation, nor does it mean that the archivist can be given free rein to indulge in lengthy research exercises intended to ferret out every last bit of information on the records and their context prior to presenting his or her appraisal recommendations. In an environment where a tsunami of information threatens our ability to select those few records we determine should be preserved, prolonged and detailed research is simply an unaffordable and unsustainable luxury; the issuance of a legal disposition authority to a government institution can no longer wait for the completion of a lengthy and comprehensive appraisal analysis.

In the final analysis, successful government records appraisal comes – and will continue to come – from finding the appropriate balance between documenting decisions to meet accountability requirements and efficient issuance

91 It must be observed that although the analytical method is similar, the archival analysis that results in the initial creation of a disposition instrument is not the same analysis that is done when an archivist determines whether an existing disposition instrument can be used in a different context or situation, i.e., how it can be interpreted. Interpretation is additional analysis that does not replace the original decision(s) but tempers, extrapolates, and clarifies the original decision at a later date. Examples of this might include the re-appraisal of existing holdings, or the determination of whether a generic disposition instrument created for a specific process or activity could be applied in a particular institutional context. Interpretations can lead to changes in the original disposition decision, which would require further formal approval before they could be enacted. In the LAC context, for example, there are formal policies and procedures that govern the circumstances in which information gleaned through interpretations of approved records disposition authorities (RDAs) made through interaction with client institutions may be transformed at a later date into amendments to a records disposition authority.

of disposition instruments. To that end, we will need to determine what is meant by “effective” appraisal. Is an effective appraisal and/or its disposition instrument simply one that results in the transfer of records? If so, the appraisals and disposition instruments issued during the three historical eras described above were indeed effective, because Library and Archives Canada currently holds 193,352 linear metres of government textual records.<sup>92</sup>

But this is a simplistic view at best. A better approach would be to examine the *nature* of the transferred records and ask: Are these the archival records that should be preserved over the long term and, if so, why? And what of the case where an appraisal has been conducted and a disposition instrument issued, yet no records have been transferred? Should this be considered as evidence of the “failure” of the appraisal and/or the disposition instrument? Or could it be the result of other factors, such as flaws in a government institution’s recordkeeping or disposition practices, or other constraints within the operational environment in which the records were created? All of these questions (and more) remain to be answered.

## Conclusion

Regardless of the supporting recordkeeping environment, or the recording or communication technology involved, it will always be necessary for government archivists to appraise, to identify that portion of the total information universe that has permanent and lasting value as archival records. Over the past decades, the primary goal of government records archivists at Canada’s national archival institution has been to identify for Canadians sufficient documentary evidence of how their government has formulated policy, made decisions, transacted its business, and interacted with Canadians – an essential part of the Canadian documentary heritage. Based on the history of this essential archival function at LAC and its predecessors, it is clear that the successful implementation of that goal rests both on the skills of archivists in conducting research-based archival analysis within a broad social context and on the ability to adapt those skills to a constantly changing information environment without losing sight of key principles. As Jerry O’Brien observed in 1985:

92 There have been 2,354 disposition instruments issued by TB and PAC/NA/LAC since 1936, of which 848 are currently active and in force (LAC, Records Disposition Authority Control System [RDACS], consulted 30 October 2012). The figures on LAC’s government textual analog holdings were obtained from the Analogue Preservation Branch on 30 October 2012, and cover multiple storage facilities across Canada, including regional service centres. For recent figures about LAC’s overall analog holdings, see “State of the Holdings: The Condition of Analogue Holdings at Library and Archives Canada” (version 2.12, February 2012), 4, [http://www.bac-lac.gc.ca/eng/about-us/modernization/Documents/State%20of%20the%20Holdings-June%202012\\_e.pdf](http://www.bac-lac.gc.ca/eng/about-us/modernization/Documents/State%20of%20the%20Holdings-June%202012_e.pdf) (accessed 30 October 2012).

The art of appraisal places a professional obligation on the archivist. He or she chooses which actions of the machinery of government and which portions of the population affected by those actions will be included in the national archival record. Choices can be costly; keeping too much or too little, is a constant threat. It is this chance of risk, of being on the firing line, that makes appraisal and selection the exciting and challenging job that it is.<sup>93</sup>

Not only do we have a professional obligation to make the “right” appraisal decision, but we also have a duty to explain to those who follow us just how the records that we kept came to be preserved. Without that explanation, vital contextual meaning is irretrievably lost. Our obligation extends not just to society and its citizens – the users of the holdings of our archives that result from our appraisal decisions – but to the archival colleagues who succeed us, for it is they that will bear the responsibility to ensure that appraisal methodology continues to grow and evolve to meet ongoing societal needs. It is also the archivists of the future who will be called upon to explain or defend our appraisal decisions, particularly in a legal setting; at the very least, we owe it to them to ensure that our decisions are methodologically sound, carried out as rationally as possible, and thoroughly documented in writing.

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93 O’Brien, “Federal Government Textual Records,” 35, LAC file WM 8015-8, vol. 1.