Everything Old Is New Again: The Evolution of Generic Appraisal at Library and Archives Canada[1]

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RÉSUMÉ Le concept de « l'évaluation générique » faisait partie de la conceptuali-sation d'origine de la macro-évaluation telle qu'elle a été développée aux anciennes Archives nationales du Canada (maintenant Bibliothèque et Archives Canada) en 1990. Cette hypothèse – que des courants fonctionnels pan-institutionnels et des domaines où des institutions partagent des caractéristiques communes peuvent appuyer sa réalisation – n'a jamais été entièrement mise en pratique. Lorsque l'accent a été placé sur la tenue de documents, en 2009, les archivistes ont développé des outils basés sur les activités communes réalisées par la plupart ou par toutes les institutions gouvernementales. Ceci a permis un réexamen plus approfondi de l'évaluation géné-rique. Au courant des cinq années suivantes, l'évaluation générique s'est étendue pour influencer et appuyer pleinement la nouvelle approche de disposition des documents gouvernementaux à Bibliothèque et Archives Canada (BAC). Cet article fournit un compte rendu de l'évolution de l'évaluation générique à BAC, et de la façon dont elle a facilité la reconceptualisation du programme de disposition qui met la théorie de la macro-évaluation en pratique d'une manière plus efficace, efficiente et responsable.

ABSTRACT The concept of "generic appraisal" was part of the original conceptual-ization of macroappraisal as it was developed at the then National Archives of Canada (now Library and Archives Canada) in 1990. This hypothesis, that cross-institutional functional patterns and areas where institutions shared common characteristics could support its implementation, was never fully put into practice. In response to a new focus on recordkeeping in 2009, archivists developed tools based on common activi-ties performed by many or all government institutions. This enabled a re-examination of generic appraisal in more depth. Over the next five years, generic appraisal grew to inform and fully support the new approach to government records disposition at Library and Archives Canada (LAC). This article provides an account of the evolution of generic appraisal at LAC, and of how it facilitated the redesign of a disposition program that puts macroappraisal theory into practice in a more effective, efficient, and accountable manner.

> *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 should be*
> *destroyed and what should be retained.*[2]

The foremost task of government records archivists at Library and Archives Canada (LAC) is to appraise the records of the Government of Canada, which more often than not means authorizing destruction under the *Library and Archives of Canada Act* (hereafter *LAC Act*).[3] Although it is impossible to measure with certainty, general estimates place the total amount of archival records produced by the Government of Canada at only 1 to 2 percent of the overall amount of information produced. The difficulty in identifying this small subset of archival records has long been a concern of archivists.[4]

At LAC, the methodology employed to do this selection is macroappraisal. This methodology was developed and articulated by staff at LAC's predecessor, the National Archives of Canada, in the early 1990s, and it has since been refined and improved by LAC archivists.[5] Macroappraisal is "a theory of appraisal that assesses the value of records based on the role of the record creators, placing priority on why the records were created (function), where they were created (structure), and how they were created, rather than content (informational value)."[6] What this means in practice at LAC is that the records considered to have archival value are those that document decision-making and

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2   W.K. Lamb, "The Fine Art of Destruction," in *Essays in Memory of Sir Hilary Jenkinson*, ed. Albert E.J. Hollaender (Chichester, UK: Moore and Tillyer, 1962): 50–51.

3   *Library and Archives of Canada Act* (S.C. 2004, c. 11) [hereafter *LAC Act*], accessed 31 August 2017, http://laws-lois.justice.gc.ca/eng/acts/L-7.7.

4   For discussions of government records appraisal, see Margaret J. Dixon, "Beyond Sampling: Returning to Macroappraisal for the Appraisal and Selection of Case Files," *Archival Science* 5, no. 2–4 (December 2005): 286; Terry Cook, "Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950–2000," *Archival Science* 5, no. 2–4 (December 2005): 142; and Jean-Pierre Wallot, "Building a 'Living Memory' for the History of Our Past: New Perspectives on Archival Appraisal," *Journal of the Canadian Historical Association* 2, no. 1 (1991): 269–70.

5   For additional analysis of the literature on the history, development, and practice of macroappraisal at Library and Archives Canada [hereafter LAC], see Catherine Bailey, "Past Imperfect? Reflections on the Evolution of Canadian Federal Government Records Appraisal," *Archivaria* 75 (Spring 2013): 7n3; Catherine A. Bailey, "Turning Macroappraisal Decisions into Archival Holdings: Crafting Function-Based Terms and Conditions for the Transfer of Archival Records," *Archivaria* 61 (Spring 2006): 148n1; and Brian P.N. Beaven, "'But Am I Getting My Records?' Squaring the Circle with *Terms and Conditions* Expressed in Relation to Function and Activity," *Archival Science* 5, no. 2–4 (2005): 315n1.

6   Richard Pearce-Moses, "Macroappraisal," in *Glossary of Archival and Records Terminology* (Chicago: Society of American Archivists), accessed 28 April 2017, http://www2.archivists.org/glossary/terms/m/macro-appraisal.

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the interactions between state structures, government activities, and citizens.[7] Inherent in early iterations of macroappraisal was a concept that came to be known as "generic appraisal." Generic appraisal consists of examining common activities and/or similar types of institutions to identify the records that most succinctly and effectively document them. For example, generic appraisal might consist of examining multiple administrative tribunals, or it could focus on the communications activity in general. The foundation of macroappraisal was built on a planned approach to providing the required legal authority to dispose[8] to all institutions of the Government of Canada, which included the appraisal of common functions in government. From the very beginning, this approach recognized the value of identifying "cross-institutional functional patterns" and areas where institutions "shared common characteristics" in order to facilitate government disposition.[9] That concept was explored as early as 1990 with the first "Government-Wide Plan for the Disposition of Government Records," which aimed to group similar institutions according to common operational functions in order to be as efficient as possible.[10] Several attempts to plan and prioritize government records disposition were implemented and frequently revised and updated over the next two decades to varying levels of success. The goal of providing complete disposition authorization coverage based on generic activities was never fully realized, however, owing to a variety of resource

7   Inherent in macroappraisal is the acknowledgment that appraisal is not a neutral procedural exercise in which archival records clearly present themselves for preservation. Choices made by archivists are subject to their biases and those of the institution in which they work. In this context, archivists actively create the archive. An intellectually accountable framework in which such decisions are documented is therefore essential. Much of the work done by government institutions is extraordinarily prescribed and transactional, and the records created as a result, such as case files documenting repetitive individual transactions, are not usually considered to have archival value. Macroappraisal, therefore, is more than a method of functional analysis. In other words, some government activities can be documented very succinctly, while others must be more extensively documented based on their impact on society or particular groups (e.g., those for whom the Canadian government has particular responsibilities, such as the military and Indigenous peoples).

8   Until 2013, these instruments were referred to as Records Disposition Authorities.

9   LAC, "Government-Wide Plan for the Disposition of Government Records" (1990), National Archives file WM 6237-13; and Terry Cook, "Macroappraisal and Recordkeeping: Continuities and Opportunities for the Digital Era," LAC internal report, 2011.

10 LAC, "Government-Wide Plan," 15. The Government-Wide Plan specifically "recommended that [the Government Archives Division] create teams of archivists to research generic approaches in the following areas … common institutions by function: regulatory …, appeal/tribunal …, and granting institutions …, to take but three examples, should be researched, and have their disposition strategies and Multi-Year Disposition Plans developed in unison by a team of archivists responsible for such institutions, rather than in isolation by individual archivists. The first task will be to study all 156 institutions to determine how many functional categories, in addition to these three examples, should be handled in this manner."

constraints, competing priorities, and external pressures.[11] Despite many successful appraisal and disposition projects carried out over the two decades since the implementation of macroappraisal, by 2009 LAC's disposition program had become increasingly untenable: appraisal projects were taking several years to complete, and most institutions had outdated, problematic disposition authorizations or, in some cases, no coverage at all for their operational records. In a digital world, it was becoming increasingly difficult to keep up with the volume of information that government institutions were creating.[12] Even more importantly, LAC simply did not have, and had never had, the resources required to support the demands of a research-heavy disposition program.[13] At the same time, the original connection between macroappraisal theory's functional analysis and the potential for using generic approaches to dispose of government records had been lost.

While the theoretical foundation of macroappraisal remained sound, these deficiencies in the program necessitated a new approach. In response, in 2009, LAC's appraisal program shifted from focusing on disposition to supporting recordkeeping in the Government of Canada.[14] Under section 7 of the *LAC Act*, LAC has a two-pronged mandate with respect to government records: "to be the permanent repository … of government and ministerial records that are of historical or archival value" and "to facilitate the management of information by government institutions."[15] In response to this focus on recordkeeping, archivists were tasked with developing new tools that were based on common activities performed by many or all government institutions. This allowed archivists to re-examine the concept of generic appraisal in much more depth than before, and to identify potential linkages between appraisal decisions expressed in existing disposition authorizations. It was in this new

11 See Bailey, "Past Imperfect?" 34; and Brian Beaven, "Macroappraisal: From Theory to Practice," *Archivaria* 48 (Fall 1999): 163–64, 166.

12 The volume of government information has been steadily increasing for decades. As LAC archivist Tina Lloyd articulated, "We often talk about post–World War II as the period of rapid growth in government bureaucracy and records, but based on the volume of our holdings, it seems to have escalated faster in the 1970s with a sudden explosion of government programs and then in the 1980s and 1990s when word-processing and computers took over, resulting in multiple versions and copies of documents showing up in files." Tina Lloyd, "From Projects to Policy: The Evolution of a Systemic Reappraisal Program," in *Appraisal and Acquisition: Innovative Practices for Archives and Special Collections*, ed. Kate Theimer (Plymouth, MA: Rowman & Littlefield, 2015), 63.

13 For example, Brian Beaven mentions complications related to underfunding, inexperienced staff, and frequent portfolio rotation; see Beaven, "Macroappraisal," 166.

14 For more information, see Bailey, "Past Imperfect?" 33–34. This is also addressed in Jenna Murdock Smith, "Rethinking a Common Approach to Appraisal in the Government of Canada" (presentation at the Association of Canadian Archivists' 37th Annual Conference, Whitehorse, 8 June 2012).

15 See *LAC Act*, ss 7(c) and 7(d).

environment that generic appraisal was put into practice, and over the next five years it grew to inform and fully support the new approach to government records disposition at LAC. What follows is an account of the evolution of generic appraisal at LAC, and of how it facilitated the redesign of a disposition program that puts macroappraisal theory into practice in a more effective, efficient, and accountable manner.

The Recordkeeping Phase

The period of increased focus on government recordkeeping at LAC began when the Treasury Board of Canada Secretariat (TBS) issued the *Directive on Recordkeeping* in June 2009, with the aim of addressing recordkeeping problems in the Government of Canada.[16] The directive was created within the context of a broader shift toward management accountability in the Canadian federal public service.[17] This shift firmly established good recordkeeping practices as an integral part of an effective, accountable public service, and positioned information as a corporate asset that required sound management. LAC spearheaded the creation of the directive, and much of the attention of its government records program focused for the next several years on facilitating federal government recordkeeping.[18] This increased emphasis on recordkeeping reflected the recognition that institutions were facing significant challenges with information management and an understanding that if departments were not adequately managing their records, LAC would not be able to acquire them.[19] As the Information Commissioner observed in his 1999–2000 annual report, "Information management in the federal government is in such a sorry state that

16 Treasury Board of Canada Secretariat (TBS), "How Government Works: Policies, Directives, Standards, and Guidelines," *Directive on Recordkeeping*, last modified 18 July 2011, http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=16552. The objective of the directive is to "ensure effective recordkeeping practices that enable departments to create, acquire, capture, manage and protect the integrity of information resources of business value in the delivery of Government of Canada programs and services"; see "Directive Statement: Objective, 5.1.1."
17 For additional information on the links between recordkeeping and management accountability, see Bailey, "Past Imperfect?" 33–34.
18 Ibid.
19 Some of the significant recordkeeping challenges faced by government institutions include new concerns brought on by the digital environment; a lack of funding for information management; staff with varying degrees of information management experience and expertise; competing priorities at the senior management level; and the complexity of government mandates, organizational structures, and information. Many of these factors have been cited by both the Auditor General of Canada and the Information Commissioner of Canada.

the term has almost become an oxymoron."[20] The directive was an attempt to address some of these issues.[21]

While TBS has the clear mandate and responsibility to provide overall policy direction for government recordkeeping, as mentioned above, LAC's mandate to "facilitate the management of information by government institutions"[22] is not well defined. This lack of clarity has resulted in different interpretations of the extent of LAC's role in providing recordkeeping services to government institutions. As a result of the shift in focus to recordkeeping rather than appraisal and disposition, archivists' work was increasingly directed toward supporting Government of Canada institutions in their efforts to become compliant with all of the directive's requirements, including those that did not directly affect disposition.[23] As part of this shift, a working group was established in the fall of 2010 to explore innovative ways to provide this increased recordkeeping support. The idea was to create new tools that focus on two broad goals: assisting government institutions in complying with the requirements of the directive while, at the same time, allowing institutions to dispose of more of their records. Disposition authorizations are granted in one of two ways: through multi-institutional disposition authorizations (MIDAs), which relate to records managed by all or a number of government institutions, and which allow the institutions empowered to use the authorizations to dispose of records; and through institution-specific disposition authorizations (ISDAs), which relate to records managed by a single government institution. In the 1990s, a series of MIDAs were issued for common administrative records created by all government institutions, covering functions such as human resources and financial management.[24]

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20 Office of the Information Commissioner of Canada, *Information Commissioner Annual Report, 1999–2000* (Ottawa, 2000), 20, accessed 22 July 2016, http://www.oic-ci.gc .ca/telechargements-downloads/userfiles/files/eng/oic99_00e.pdf. The Information Commissioner also identified the problematic state of recordkeeping in the federal government in annual reports in 1998–1999, 2000–2001, and 2002–2003. The 2001–2002 report devotes an entire chapter to this subject, describing information management as "the heart and soul of the project to strengthen government accountability"; see Office of the Information Commissioner of Canada, *Information Commissioner Annual Report, 2001– 2002* (Ottawa, 2000), 23, accessed 22 July 2016, http://www.oic-ci.gc.ca/telechargements -downloads/userfiles/files/eng/oic01_02E.pdf.

21 Under the directive, government institutions are required to identify information resources of business value (IRBV), develop and maintain repositories to store those IRBV, establish controls to manage their IRBV (such as retention periods, taxonomies, and classification structures), perform regular disposition activities, and document that disposition. For further information on IRBV, see n29.

22 *LAC Act*, s 7(d).

23 A significant amount of work was done to provide direct recordkeeping support to government institutions throughout this period; a broader discussion of this work is beyond the scope of this article.

24 The suite of common administrative MIDAs replaced the General Records Disposition Schedule (GRDS), which also addressed common administrative records. The GRDS was

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This early iteration of generic appraisal focused exclusively on administrative records as it was far less complicated to make high-level appraisal decisions for routine administrative functions than for core operational activities that support legislated mandates.[25] The records created by administrative activities are generic: they do not provide evidence of how institutions fulfill their core mandates, but reflect enabling activities that create routine, transactional records that are prescribed and predictable regardless of institutional context.

The working group was tasked with developing new MIDAs that had accompanying tools to support effective recordkeeping.[26] As part of LAC's alignment with TBS and larger trends in management accountability in government, the group focused on 11 common activities that reflected the language and concepts federal government institutions were required to use to report on and manage their work.[27] Eight were recognizable to LAC archivists as common administrative activities; they mirrored the common administrative MIDAs described above.[28] The other three are what the working group came to consider "strategic" activities: Communications, Legal Services, and Management and Oversight. The group developed recordkeeping tools known as Generic Valuation Tools (GVTs) for each of these 11 activities. The GVTs identify common

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based on subjects and record types, while the MIDAs were based on functional descriptions of government business activities. For further information, see LAC, "Appraisal Report for 98/005 (Common Administrative Records Related to the Human Resources Management Function)," LAC file 6243-10-98/005.

25 One exception to this general rule was the MIDA issued to the Nineteen Port Authorities in Canada (LAC file 6240-10-2002/001), which was an early example of an attempt to issue disposition authorization to multiple institutions that performed the same function and produced similar records.

26 This was first established as the MIDA Development Working Group. Core members included Pat Burden, Diane Dagenais, Michael Dufresne, Natalie Dyck, Laurena Fredette, Tina Lloyd (original project lead), Emily Lonie, Shawna Moffatt, Jenna Murdock Smith, Crystal Parsons, and David Rajotte. The group later became a dedicated section known as the Generic Valuation Tools Team; members included Diane Dagenais, Ben Deurloo, Jon Fotheringham, Rebecca Giesbrecht, Nancy Gover, Kathryn Lagrandeur (manager), Emilie Létourneau, Emily Lonie, Shawna Moffatt, Jenna Murdock Smith, David Rajotte, and Jennifer Wilhelm.

27 See TBS, *Profile of Government of Canada Internal Services*, available from LAC, "Records Disposition – Disposition and Recordkeeping Program (DRKP) – Generic Valuation Tools (GVT)" (2008), file 6248-4-1. In 2014, TBS replaced the "Profile of Internal Services" with the *Guide on Internal Services Expenditures*, followed by the *Directive on Results* in 2016. The *Directive on Results* only identifies seven internal services, leaving out Communications, Management and Oversight, Legal Services, and Travel and Other Administrative Services. For a detailed description of these activities, see n38.

28 The common administrative Generic Valuation Tools are Acquisitions Services; Financial Management; Human Resources Management; Information Management; Information Technology; Material Services; Real Property Services; and Travel and Other Administrative Services.

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business processes associated with each activity, types of information resources of business value[29] associated with these processes, and recommended retention specifications that may be used to trigger disposition. They do not, however, provide any legal authorization to dispose of records.

The group also began to develop GVTs by identifying different operational activities commonly performed by multiple government institutions. One of the first steps was to examine any relevant work that had been done previously. Of vital importance was the "MIDA for Operational Case File Records," which was developed in the mid-2000s.[30] Unlike the common administrative MIDAs, this tool addressed operational records and was based on record type rather than a common function. Years of experience using this MIDA helped archivists develop a solid understanding of both the activities that resulted in the creation of case files and the content of the records themselves. As a result, the Case File MIDA had provided a level of familiarity with certain common operational activities that generated transactional case files and that appeared to be prescribed and predictable. Common operational activities across government had also been identified in the original government-wide plan from 1990, but at the time the proposal was to look at similar institutions as a whole as opposed to the activities or functions themselves. For example, the plan suggested developing disposition authorizations for "tribunals" and "granting institutions."[31] The procedures supporting the practice of macroappraisal at the then National Archives did not include a clear definition of function or of how functional analysis should be used to implement an effective disposition program. Though much of the published literature and internal documentation on macroappraisal addressed functional analysis at a theoretical level, it was unclear exactly how this could be implemented in a practical sense. This led to inconsistency, resulting from differing approaches to the determination of project scope and articulation of appraisal decisions. While early applications of macroappraisal were

29   See TBS, "How Government Works: Policies, Directives, Standards, and Guidelines," *Directive on Recordkeeping*, section 3.3, last modified 18 July 2011, http://www.tbs-sct .gc.ca/pol/doc-eng.aspx?id=16552: "Information resources of business value include published and unpublished materials, regardless of medium or form, that are created or acquired because they enable decision making and the delivery of programs, services and ongoing operations, and support departmental reporting, performance and accountability requirements. An information resource identified as having business value and placed into a repository enables effective decision making and provides reliable evidence of business decisions, activities and transactions, for program managers, deputy heads, ministers, and Canadian citizens."

30   See LAC, "MIDA 2005/006 for Operational Case Files," LAC file 6240-10-2005/006; and Dixon, "Beyond Sampling."

31   See LAC, "Government-Wide Plan"; and Cook, "Macroappraisal and Recordkeeping."

targeted at specific business units or tied to specific recordkeeping structures, over time archivists began to focus their efforts more and more on identifying high-level functions and sub-functions in government institutions that would remain relatively stable across time and were tied to mandated legislation. The hope was that these appraisal decisions would better stand the test of time in an environment where recordkeeping systems and organizational structures frequently change. While there was merit to this approach, it also meant that archivists became quite removed from the way in which government institutions understood and articulated their work. This led to confusion between LAC archivists and their colleagues responsible for government information management about the application of the final disposition authorizations.

The working group's decision to align with TBS and its language and understanding of activities resulted in a different approach to macroappraisal and the concept of functional analysis. Use of the Internal Services Profile meant that the administrative and strategic activities for the Government of Canada were already defined, and therefore it was possible to break down common functions at the level of activities and business processes instead of at a broader institutional level. What's more, work with TBS and the development of the GVTs highlighted how business process analysis could be useful in a macroappraisal context. The group recognized that in order to be able to create a GVT and complete a business process analysis for a given activity, the activity had to be prescribed and predictable. This meant that it had to be possible to break it down into business processes and identify common record types created by those processes.

The group looked at government institutions subject to the *LAC Act* and began trying to identify what kinds of activities they performed, to see if commonalities would emerge. An obvious target was funding. Not only does this activity make up a significant percentage of the Government of Canada's work, but it is also relatively straightforward to understand because (a) it involves the issuance of public money and is therefore heavily reported on; and (b) because it involves the creation of a large number of operational case files, which are transactional and predictable. Once a GVT was created for the funding activity,[32] work was expanded to include other operational activities, including Regulatory Compliance and Enforcement, Authorization,[33] Investigation, Adjudication,

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32 The common terminology for funding in the Government of Canada is "transfer payments," which is also the official title of the Generic Valuation Tool (GVT), LAC file 6248-4-5. The term "grants and contributions" is also sometimes used to refer to this activity. For clarity, the term "funding" is used in this article.

33 Authorization refers to the activity of licensing and certification.

and Science and Technology.[34] GVTs were developed for nearly all common activities performed by the Government of Canada.[35]

As mentioned above, the working group had a second important goal: to provide government institutions with the authority to dispose of as many of their records as possible. Since so many government institutions had outdated, partial, or problematic disposition coverage, or none at all, the more new authorizations LAC could create quickly and efficiently, the better. At the same time, this goal was complicated because senior management at LAC had determined that macroappraisal should no longer be the theoretical foundation for the government records disposition program and directed the program toward a focus on recordkeeping.[36] Archivists, including members of the working group, understood that macroappraisal remained theoretically sound and continued to implement it and develop its practice. Management priorities in this area, however, concentrated on the recordkeeping portion of the instruments (the GVTs), and little attention was given to the generic appraisal component.

Creating new authorizations proved to be a much greater challenge than developing recordkeeping advice. In instances where common administrative

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34   GVTs were also developed for two other activities that are performed by all government institutions but are not included in the Internal Services Profile: Cabinet Affairs (LAC file 6248-4-8) and Treasury Board Submissions (LAC file 6248-4-20).

35   All GVTs are available online at LAC, "Services and Programs: Government Information Management and Disposition – Information Management (IM)," accessed 26 July 2017, http://www.bac-lac.gc.ca/eng/services/government-information-resources/guidelines/generic-valuation-tools/Pages/introduction.aspx.

36   Management instead led the development and endorsement of the "whole-of-society" approach. For a discussion of the links between macroappraisal and the whole-of-society approach in this period, see Bailey, "Past Imperfect?" 37. For an articulation of this approach from management's perspective, see Daniel J. Caron, "Recordkeeping as a Pillar of Public Memory, Accountability, and Administration: The Canadian Experience" (speech delivered at the Canada–Japan Symposium on e-Government Document Management, National Libraries and Archives: Building New Frameworks to Preserve and Disseminate Intellectual Assets, Tokyo, Japan, 2 February 2011), accessed 31 August 2017, http://publications.gc.ca/collections/collection_2017/bac-lac/SB4-18-4-2011-eng.pdf; 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), accessed 31 August 2017, https://www.bac-lac.gc.ca/eng/news/speeches/Pages/digital-archives-digital-world-remark.aspx; 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), accessed 31 August 2017, https://www.bac-lac.gc.ca/eng/news/speeches/Pages/leaving-cathedral-entering-bazaar-remark.aspx; 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.

MIDAs already existed and provided the appropriate authorization for institutions to dispose of their administrative records, it was straightforward: a simple mapping exercise between the GVT and the appropriate MIDAs would be all that was necessary. In cases where activities did not have associated MIDAs, however, the task was much more complicated. Appraising records in a generic fashion, devoid of institutional context, had the potential to create a situation in which records of archival value could be missed or records that were not of archival value would be acquired. Decades of experience had demonstrated that painting all records created by common activities with the same brush was not as risky when it came to records that were unlikely to be of archival value, such as common administrative records, but when it came to operational records that were at the core of the work done by the federal government, the stakes were raised. Archivists understood that the significance of an institution and the context of records creation had to be what determined which records were acquired. This highlighted the continual tension in the disposition program for government records: finding a balance between providing consistent advice and direction to guide archivists in appraisal work and allowing for the knowledge and professional expertise that underlies the appraisal process. MIDAs for activities that did or could create archival records would not account for the nuance that individual context presented.

This realization led the working group to consider a different approach: what if, instead of authorizations, the tools were broader contextual appraisal guidelines that archivists could look to when creating institution-specific disposition authorizations? As the work of the group progressed, it became clear that since the activities described in the GVTs were performed by multiple institutions, associated appraisal guidelines could be an important tool for archivists conducting appraisals. Not only would this save valuable time in the appraisal process, but it would also ensure a consistency of approach, allowing archivists to make common decisions on how certain activities are documented without having to reinvent the wheel each time. The working group developed what came to be known as Generic Appraisal Guidelines, each of which were associated with a GVT.[37] As described above, many of the internal services directly correlate to the existing MIDAs that institutions were already using to dispose of their common administrative records. On the other hand, the three strategic activities – Management and Oversight, Communications, and Legal Services – go beyond straightforward administrative work and are in fact crucial to the strategic management and governance of institutions in the Government of Canada. Some of the records that best document the ways in which federal government institutions fulfill their mandates

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37   These were originally known as Enduring Value Guidelines, which can be found in LAC file 6248-4.

are created as a result of these activities.[38] For this reason, the records produced by these activities are of considerable interest to LAC archivists.

Extensive research went into the creation of the Generic Appraisal Guidelines, beginning with a thorough review of all existing relevant appraisals. For the guideline on Management and Oversight,[39] this research revealed that previous authorities had called for the transfer of the same types of records in nearly all cases, including, for example, records documenting the development of strategic and operational policy, senior management committees, and program evaluation.[40] Archivists had been making the same decisions in nearly every appraisal but had come to these conclusions on their own each time. It was clear that this was not an efficient use of limited resources. The Generic Appraisal Guidelines made commonalities in past practice explicit, codifying knowledge that archivists had acquired over time.

The group also developed Generic Appraisal Guidelines for operational activities, beginning with the funding activity. By appraising the activity in a more general way, the authors of the guidelines were able to concentrate on developing a broader understanding of how funding works in the Government of Canada as a whole, not just in a specific institution. This included how the government organizes itself to issue funds, how institutions report on this work, and what records are created by these processes. Appraising the funding activity as a whole provided the opportunity to develop a fuller understanding of how funding may be effectively documented: through records created by central agencies, from published sources, and as a result of high-level decision-making by individual institutions, rather than through transactional case files. Furthermore, funding and the records it generated were well understood at LAC, in part because of the work conducted for the "MIDA for Operational Case File Records."[41] Just

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38   According to the Internal Services Profile (see n27), Management and Oversight Services involve activities undertaken for determining strategic direction and governance; program planning and design; representing values and ethics; and allocating resources and taking investment decisions; as well as those activities related to analyzing exposure to risk and determining appropriate countermeasures. Communications Services involve activities undertaken to ensure that the Government of Canada's communications are effectively managed, well coordinated and responsive to the diverse information needs of the public. Legal Services involve activities undertaken to enable government institutions and agencies to pursue policy, program and service delivery priorities and objectives within a legally sound framework.

39   LAC, *Generic Appraisal Guideline on Management and Oversight Services*, LAC file 6243-11-2.

40   In particular, Records Disposition Authority 2009/003, issued to Industry Canada for records related to the Corporate Management function (LAC file 6240-50/J18-2009/003), was a model for the archival recommendations in the Management and Oversight Services guideline.

41   See "MIDA 2005/006 for Operational Case Files"; and Dixon, "Beyond Sampling." The lack of archival value of most government case files was confirmed through the strategic reappraisal of records in the LAC collection, which had been done in the preceding five

as this MIDA had helped the working group identify operational activities, it also provided an appraisal of case files, a significant number of which related to funding. This made it possible to create a Generic Appraisal Guideline for archivists to clarify this understanding, place the activity in its broader context, and identify questions that an archivist should ask before authorizing disposition for a specific institution.[42] When archivists were tasked with appraising institutions that issued funds, they began by reading the GVT and the associated Generic Appraisal Guideline, which gave them a solid starting point to understand the context of the activity and allowed them to make appraisal decisions that were more consistent and better supported. At the same time, the expertise and analysis of archivists remained an essential part of the appraisal process; because the GVTs and the Generic Appraisal Guidelines were not authorizations, archivists were able to make different appraisal decisions when they were more appropriate for the context of an individual institution and its authorization. Using this approach, archivists could avoid a "paint by numbers" situation in which they simply accepted the recommendations in the Generic Appraisal Guidelines without evaluating the records in their context.

The group continued to develop Generic Appraisal Guidelines for other operational activities. As they addressed more complex activities, or ones for which there were fewer documented appraisal decisions, the task became more difficult. It was also complicated by the way in which the concept of function had been understood, and by the complex relationships between activities undertaken by the federal government. As the suite of GVTs and guidelines were developed, it became clear that targeting the activity level provided a much more flexible approach than was possible at a broader functional level. Regulating is a good example of this. By examining the regulatory function at the activity level, it was possible to break it down into four distinct pieces: regulatory compliance and enforcement; authorization; investigation; and adjudication. As research into these activities progressed, it became clear that they operated together in different ways depending on the individual context of the institution. Therefore, appraising at the activity level allowed archivists to examine the interrelationships between the activities both from a regulatory context and from outside of the regulatory framework. A generic appraisal of activities allowed archivists to engage with the analysis of the specific activities that were performed by their institution (i.e., they could select the activities that applied). Alignment with TBS's Internal Services Profile, particularly with regard to the strategic activities, also clarified a broader understanding of how the activities operated at a high level in the federal government.

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years using the case file MIDA, as addressed in Lloyd, "From Projects to Policy."

42   LAC, *Generic Appraisal Guideline on Transfer Payments*, LAC file 6243-11-15.

By examining particular government activities as a whole, archivists also developed a more refined understanding of how central reporting and documentation worked in the federal government. Guidance for how to approach macroappraisal at LAC was outlined by Terry Cook in "Appraisal Methodology: Macroappraisal and Functional Analysis – Part B: Guidelines for Performing an Archival Appraisal on Government Records." As Cook articulated in this document, "Typically, macro-appraisal methodology moves in a top-down fashion from the operational purpose or broad societal function of the records creator, through various administrative structures and business processes designed to implement that function … to information systems created to produce and organize records that permit those processes to work, and finally to the records."[43] This concept was based on the assumption that, as archivists moved from the top down, they would both gain a better understanding of the context of records creation and determine how to sufficiently document a function or activity without having to examine every record. This goal, which remained constant throughout the development of the disposition program at LAC, was facilitated by generic appraisal, which gave archivists a suite of tools that clarified this process and provided them with a starting point that acted as a sort of road map to government.

The development of the Generic Appraisal Guidelines allowed the group to understand the entire government in a much more holistic way. In this environment, the traditionally resource- and time-intensive process of appraising even the largest and most complicated institutions began to look far more feasible. Institutions that had seemed at first glance to be complex and daunting could instead be broken down into manageable parts, and no individual archivist would be starting from square one. Prior to this work, specific institutions or even individual programs were typically appraised in isolation, and patterns could not truly be recognized until they were researched as a group. This does not mean that the specific recommendations in the appraisal guidelines are set in stone, but using them as a starting point allows archivists to focus their attention on the unique activities performed by the institution, instead of appraising common activities for every institution.

By the spring of 2013, the bulk of the work on the GVTs and Generic Appraisal Guidelines was complete and the intention was that archivists would use them when conducting new appraisals. Though they were not authorizations,

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43 LAC, "Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B: Guidelines for Performing an Archival Appraisal on Government Records" (2001), LAC file 6243-0, vol. 1, now file GC-1-030-01 Policy – Records Disposition – Government Institutions – Records Analysis and Archival Appraisal Reports. See also LAC, "A Brief History of the LAC Macroappraisal Methodology for Government Records," accessed 26 July 2017, http://www.bac-lac.gc.ca/eng/services/government-information-resources/disposition/Pages/macroappraisal-methodology.aspx.

the Generic Appraisal Guidelines were intended to be understood and used as a suite of tools that worked together. Most importantly, it was crucial that archivists examine the strategic guidelines first, since so many of the decisions made in the operational guidelines hinged on an in-depth understanding of the archival records created by these key strategic activities. For instance, the recommendation to consider funding case files as non-archival was sound, because the research conducted for Management and Oversight demonstrated that LAC would be acquiring the high-level strategic records from that activity, which are the records that most efficiently and succinctly document how institutions issue public funds. In this respect, generic appraisal allowed LAC to further refine and strengthen the macroappraisal tenet of appraising from the top down.

The development of the GVTs and Generic Appraisal Guidelines was a significant step forward, both in terms of improving LAC archivists' understanding of how government works and of providing consistency in appraisal decisions to assist archivists in their work. Furthermore, the GVTs gave LAC archivists and government information management professionals a common language and understanding of activities performed by the Government of Canada, and this improved communication and recordkeeping efficiency. Notwithstanding such improvements, the developments still did not address the basic problems that continued to plague the LAC disposition program. While significant progress was made during this period through work with TBS to provide recordkeeping assistance to the Government of Canada, not all existing issues with the program had been addressed. The most significant was the length of time and effort necessary to conduct appraisal research and create new disposition authorizations.

Between 2009 and 2014, the Librarian and Archivist of Canada approved between two and nine disposition authorizations per year, most of which did not provide comprehensive coverage to Government of Canada institutions. On average, larger projects took between three and five years to complete, and as of 2014, well over half of government institutions were lacking authorizations with complete, up-to-date disposition coverage.[44] Even after several attempts at overhaul, the program remained process heavy. If LAC did not provide authorization to dispose, records of high archival value would remain in file rooms and on servers in government institutions across the country. In concentrating so many resources on an effort to write the perfect appraisals, the very real risk of not acquiring archival records was left unaddressed. It was clear that LAC needed a new approach.

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44   LAC, "Recommended Approach for Disposition for LAC Response to the Auditor General's Report: Briefing to the Librarian and Archivist" (22 September 2014), file LAC-2-080-01 (formerly 1135-A103), titled "OAG Response Task Force 2014."

The Auditor General's Report and a New Approach to Disposition

The challenges facing the government records disposition program had not escaped notice, and the *2014 Fall Report of the Auditor General of Canada* included a chapter about LAC that provided the results of a performance audit covering the period between the 2009–10 and 2014–15 fiscal years. As the report noted, a performance audit is "an independent, objective, and systematic assessment of how well government is managing its activities, responsibilities, and resources."[45] Reports of the Auditor General, issued several times a year, help parliamentarians oversee government activities and hold the federal government accountable. This was the first time in over a decade that LAC had been the subject of such an audit.[46] The overall objective of this portion of the audit was to "determine whether Library and Archives Canada has fulfilled its responsibilities for acquiring and preserving government documentary heritage from federal institutions, and for facilitating access to these records for current and future generations."[47] One focus was LAC's disposition program.[48] The audit found that LAC had not provided government institutions with up-to-date, comprehensive disposition authorizations and could not ensure that it was acquiring all records of archival value from federal institutions. The report included a recommendation that LAC develop a plan "with achievable timelines for issuing and updating the necessary disposition authorities."[49]

The report identified problems that had existed for a long time, and LAC's senior management agreed that the current program was not meeting its objectives. In response, Guy Berthiaume, the new Librarian and Archivist of Canada, set up a team of four archivists, who reported directly to Director General

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45   "Documentary Heritage of the Government of Canada – Library and Archives Canada," *2014 Fall Report of the Auditor General of Canada*, chap. 7, accessed 15 February 2016, http://www.oag-bvg.gc.ca/internet/English/parl_oag_201411_07_e_39965.html.

46   Chapter 6 of the *2003 November Report of the Auditor General of Canada* addressed protection of cultural heritage in the federal government. It included a section on archival heritage and focused on issues related to disposition and accessibility of government records; see Auditor General of Canada, "Protection of Cultural Heritage in the Government of Canada," *2003 November Report of the Auditor General of Canada* (Ottawa, 2003), chap. 6, accessed 1 February 2017, http://www.oag-bvg.gc.ca/internet/English/parl_oag_200311_06_e_12929.html. The Auditor General's report of November 1983 also identified the inability of the then Public Archives of Canada to carry out the mandate to evaluate records scheduling and the negative impact this had on the acquisition of government records; see Auditor General of Canada, "Public Archives of Canada," *1983 Report of the Auditor General of Canada* (Ottawa, 1983), chap. 15.

47   Auditor General of Canada, *2014 Fall Report of the Auditor General of Canada* (Ottawa, 2014), accessed 31 August 2017, http://www.oag-bvg.gc.ca/internet/English/parl_oag_201411_e_39950.html.

48   The report also addressed digital readiness and the backlog of archival government records.

49   Auditor General of Canada, *2014 Fall Report*, section 7.17.

Robert McIntosh, to re-imagine the entire disposition program.[50] Instructed that "everything is on the table except the Act," the team attempted, over the course of two months, to deconstruct, reconceptualize, and present a feasible means of rebuilding the appraisal and disposition program.

Given the challenges mentioned earlier in this article, which were highlighted in the Auditor General's report, it was apparent that LAC would never be able to give each and every institution the amount of dedicated time and attention required to specifically appraise every activity and record. In this context, it also became clear that there were two solid parts of the program from which to rebuild a revised approach: the sound theoretical foundation of macroappraisal and the more practical Generic Appraisal Guidelines. The team faced a number of questions: How could these tools be used to help build efficiencies in the new program? And how could archivists leverage them to deliver intellectually rigorous, accountable disposition coverage to the entire Government of Canada?

As noted earlier, the Generic Appraisal Guidelines represent a solid body of research and sound archival analysis, and they codify an understanding of common administrative and operational activities in government, thus helping archivists appraise individual institutions more efficiently and effectively. But LAC archivists still did not – and never would – have the ability to appraise every institution in government individually, so the team needed to think more broadly about how to address this perennial problem. The goal was to take what had been learned and developed over the preceding few years and translate it into a new way to appraise more than one institution at a time – a task that required a substantial shift in approach.

The team based the new approach to disposition on three core principles, with the goal of getting back to the original tenets of macroappraisal. First, the decision was made to simplify the disposition program by ensuring that government institutions only need to apply one disposition authorization. This means that one appraisal covers an institution in its entirety.[51] In the previous

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50 These archivists were Catherine Bailey, Rebecca Giesbrecht, Emilie Létourneau, and Renaud Séguin. Additional staff members were responsible for addressing the problem of the LAC accessioning backlog.

51 In some cases, large institutions were applying upwards of 30 authorities to dispose of their records, which were written at different times and in a variety of formats, sometimes dating back to the 1960s. These were quite complicated to apply and interpret, and there were often gaps in coverage that could be difficult to determine. The original aim of the planned program and its use of macroappraisal, as expressed through many internal and published documents, was to be "comprehensive." Appraisals – and the disposition authorities that resulted from them – were intended to target "an entire functional or program area (usually a branch or sector), which should include all headquarters, regions, and field levels, and all their series, systems, and records collections, in all media. For mid- and small-size institutions, comprehensive ideally includes all the records of the institution covered in one submission, and thus one appraisal" (LAC, "Appraisal Methodology: Macroappraisal and Functional Analysis – Part A: Concepts and Theory" (2001), LAC file 6243-0, vol. 1,

program, institutions applied a combination of ISDAs and MIDAs to their records, and these could be based on record type, function, or program area. The second principle is to cluster institutions wherever possible. LAC issued new types of MIDAs to groups of institutions that perform the same activities or create the same types of records (e.g., administrative tribunals, funding institutions, museums). The third principle is the most significant: a phased approach to disposition. In the first phase, LAC issues a disposition authorization that indicates areas of archival interest at a strategic level, based on research about mandate, functions, and activities. In the second phase, the archivist validates these recommendations by examining schedules, business analyses prepared by institutional staff, and records, and/or by speaking to operational staff to determine which specific records LAC wants to acquire. This allows archivists to create authorizations that identify areas of archival interest at a strategic level and then customize what records should be acquired, depending on the individual context of the institution. The validation phase is the most significant innovation because it mitigates the risk inherent in clustering institutions and potentially missing records from any one of them. This second phase allows archivists to narrow down to those specific, unique areas that require additional analysis and attention. Archivists can only spend time appraising what they determine is of the highest potential archival value. The program returns to the core principles of macroappraisal but is also designed to incorporate risk in a more realistic manner, with the goal of developing new approaches to address and mitigate these risks.

With a better understanding of common activities in government now codified through the Generic Appraisal Guidelines, the next step was to begin thinking about how this work could be translated into a more efficient, effective disposition program, with significant reductions in time and effort.[52] How could this knowledge help LAC acquire records and spend less time working with records that did not have archival value? In the first place, the Generic

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now file GC-1-030-01 Policy – Records Disposition – Government Institutions – Records Analysis and Archival Appraisal Reports). However, many practitioners, including Terry Cook himself, readily admitted that "there have been some compromises concerning the comprehensiveness of submissions, and thus appraisals, agreements, and authorities"; see Terry Cook, "A Report on Recasting the Records Appraisal and Disposition Program at the National Archives of Canada" (February 1998), LAC file 6235-0, vol. 3, 11.

52   One of the most significant reductions in process for the disposition program was the implementation of delegated authority for the approval of new authorizations. Senior management made the decision to delegate this authority from the level of the Librarian and Archivist to the Chief Operating Officer. Librarian and Archivist Guy Berthiaume approved the first institution-specific disposition authorization and the first multi-institutional disposition authorizations that were created by the task force, to confirm he was comfortable with this approach. See disposition authorizations 2015/002 issued to Employment and Social Development Canada (LAC file 6240-50/E19-2015/002) and Multi-Institutional Disposition Authorization 2015/003 for Funding Institutions (LAC file 6240-10-2015/003).

Appraisal Guidelines allowed LAC archivists to identify and group institutions that performed similar activities, enabling the development of new disposition authorizations that would provide comprehensive coverage to multiple institutions at once.

The new approach focuses on making bolder, strategic appraisal decisions upfront, which allows for more in-depth research and analysis, including microappraisal of the records themselves, only where required. It is clear that a situation in which all archival recommendations would need to be validated before being applied would be far too resource intensive for LAC and would not be beneficial to institutions. Therefore, the goal of the new program is to provide the authorization to dispose upfront whenever possible and to include validation requirements only for specific areas that require further examination to refine decisions. When it is clear that there are no archival records created in a particular area, there is no need for validation, and institutions can go ahead and dispose of the records without further consultation with LAC.[53] This is a major departure from the previous program and is the key to assuming the risk involved in creating new MIDAs, because validation accounts for any institutional differences that might exist in terms of the subject matter and context of the records.

Once the overall approach to the new program was determined, the development of a new disposition plan was possible. A government-wide plan for disposition had been a key component of macroappraisal from its conception, and the development of a disposition plan with achievable timelines was one of the recommendations of the Auditor General. There had been several attempts to implement such a plan over the years, but they had never been fully realized for a number of reasons.[54] External pressures in government institutions always seemed to derail the plan. In order to ensure that this would not happen again, it was essential that the plan be based on a solid foundation, that it was adhered to, and that LAC was transparent and accountable for it. In January 2015, a working group was established to create the new disposition plan.[55] It was clear that the most important aspect in developing it would be to consider how institutions were clustered. The group was charged with looking at all of the nearly

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53   The way in which archival records are identified in the authorization depends greatly on the state of recordkeeping in the institution. In some cases, archivists can be very specific about archival records and therefore the validation stage will require little work. More frequently, however, the authorization is only as specific as the record type or area where archival records may be created. In these cases, a more intensive validation process is required.

54   For a discussion of attempts to implement a planned disposition program, see Bailey, "Past Imperfect?" 34. For examples, see LAC, "Government-Wide Plan for the Disposal of Records, 1991–1996," LAC file 6237-15; and Beaven, "'But Am I Getting My Records?'" 315–41.

55   The members of this group were Rebecca Giesbrecht, Christine Lovelace, Roddy McFall, Jenna Murdock Smith, Erika Reinhardt, and Renaud Séguin.

200 institutions subject to the *LAC Act*[56] and thinking of all possible ways that institutions might be grouped to authorize the disposition of their records. The team explored clustering based on reporting structure, mandate, and activities. Once again, thanks to its easily understandable nature – and the existence of the Generic Appraisal Guideline – the funding activity seemed like a manageable place to start. To determine which entities were good candidates to be covered by a MIDA for funding institutions, the team looked at all the ones whose primary mandate was to fund and conduct preliminary research. Fourteen institutions were identified, and they were to be examined further by the appraising archivists when they began their research.[57]

   Developments around generic appraisal, such as clustering institutions with similar mandates, allowed resources to be devoted where they were most needed: appraisal of the most complex and significant institutions in the Government of Canada – central agencies[58] and line departments.[59] It was clear that it would never be possible or desirable to apply the guidelines to complex institutions such as these without thoughtful analysis about their unique context. In the end,

56   As of December 2017, the Disposition Plan listed 173 institutions that are subject to the *LAC Act*. It should be noted that determining which institutions are subject to the Act is not a straightforward undertaking and involves understanding complex relationships to several other pieces of legislation.

57   The institutions originally identified were the Federal Economic Development Agency for Southern Ontario, Canadian Northern Economic Development Agency, Pierre Elliot Trudeau Foundation, Canada Foundation for Sustainable Development Technology, Canadian Institutes of Health Research, Canada Foundation for Innovation, Economic Development Agency of Canada for the Regions of Quebec, Western Economic Diversification Canada, Telefilm Canada, Atlantic Canada Opportunities Agency, Natural Sciences and Engineering Research Council, Social Sciences and Humanities Research Council, and Canada Council for the Arts.

58   According to Alex Smith, "The central agencies of the federal government – the Prime Minister's Office, the Privy Council Office, the Treasury Board of Canada Secretariat, and the Department of Finance – play a key role in the federal government's decision-making processes and administration. They work to ensure policy coordination, good administrative practices, and prudent fiscal management." See Alex Smith, *The Roles and Responsibilities of Central Agencies* (Ottawa: Library of Parliament, Parliamentary Information and Research Service, 2009), accessed 15 March 2016, http://www.lop.parl.gc.ca/content/lop/researchpublications/prb0901-e.htm#a24.

59   According to the Privy Council Office, "Ministerial or line departments refer to those organizations listed in Schedule I of the *Financial Administration Act*, which are created by statute that sets out the Minister's area of jurisdiction and prescribe his/her responsibility for direction and management. A ministerial department is legally under the control of the responsible Minister (i.e., without independent legal personality), and therefore the least autonomous institution through which the Crown carries on business. An example of such a department is Agriculture and Agri-food Canada"; see Privy Council Office, Information Resources, *Glossary of Terms for Parliamentary Returns* (Ottawa, 23 January 2009), accessed 15 March 2016, http://www.pco-bcp.gc.ca/index.asp?lang=eng&page=information&sub=publications&doc=gloss/gloss-eng.htm.

the group identified a list of possible MIDAs (and the institutions associated with those MIDAs) as well as institutions that required institution-specific authorizations.

The group also developed a plan to prioritize the order in which institutions would be appraised, to ensure that this work could be accomplished within a reasonable timeframe. It was recognized that the plan would have to evolve as the work progressed, so it was designed to be adjusted as needed to reflect the shifting realities of the program.

Conclusion: A Reflection on the Development of Generic Appraisal at LAC

In November 2014, shortly before the disposition plan working group began to meet, the Task Force on Government Records was established to address the concerns raised by the Auditor General. On 1 April 2016, the task force, which originally had a three-year mandate, was permanently integrated into LAC's organizational structure as the core of a new Government Records Branch.[60] By April 2017, 78 percent of government institutions subject to the *LAC Act* had comprehensive and up-to-date disposition authorizations, providing more coverage than ever before.[61] The disposition plan is adhered to and is consistently updated, and LAC is on track to achieve complete coverage by March 2018.

While the new program has achieved impressive results, the problematic state of recordkeeping in many government institutions remains a significant challenge. One of the goals of validation was to ensure that the program could be adapted to meet the recordkeeping realities of individual institutions. It was recognized that this would be the only way to effectively map archival decisions to specific records for acquisition. Furthermore, the goal, wherever possible, is to build on the recordkeeping work in which institutions are engaged in order to make it easier for them to apply authorizations and perform regular disposition activities. LAC can then fulfill its legal obligations under the *LAC Act* by issuing disposition authorizations to institutions in the first phase of the program. The period of increased focus on government recordkeeping at LAC made evident that cleaning up information management in government is not and could not be LAC's primary role given the current legislative context, which does not provide LAC with a clear mandate and powers with regard to recordkeeping. In the previous program, archivists would spend years trying to identify specific archival records even when institutions were not effectively managing them. This intensive approach was not sustainable given LAC's resources, but by following

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60 As of June 2017, the Government Records Branch was combined with the Private Records Branch to become Archives Branch, but its functions have not changed.

61 In addition to disposition work, task force archivists also managed to eliminate a 98,000-box accessioning backlog by December 2015, addressing another of the key findings in the Auditor General's report.

the current plan, it appears that LAC will be able to provide comprehensive disposition coverage to all institutions under the *LAC Act*. While the effectiveness of this approach remains to be seen, it seems likely that the validation phase will enable archivists to focus on the specific records to be transferred to LAC for preservation. It is clear already, however, that this will be a labour-intensive process and will depend on government institutions having some control over their records.[62] LAC can decide when and where to engage in validation work depending on the state of information management in the institution.

One of the strengths of LAC's new disposition program is the robust foundation of generic appraisal. This approach has helped refine and improve LAC's continuing use of macroappraisal methodology. Generic appraisal ensures that archivists appraise government institutions in a top-down manner, and it has been instrumental in the development of the most recent disposition plan and the current phased approach to disposition. This approach can be found throughout the program: not only in the new MIDAs and Generic Appraisal Guidelines, but also in the work done to appraise individual institutions. Generic appraisal has also provided a more thorough understanding of government and the relationships between activities, and at the same time has provided an approved and documented approach to appraisal. These developments have allowed for more accountability in archival decision-making.[63] The better LAC archivists understand the records created by government, the better able they will be to explain and defend the decisions they make about these records.

In the previous program, appraisals were complex, intellectually rigorous undertakings that required years of research. Generic appraisal has enabled LAC to streamline this process without sacrificing the quality of the research and analysis. The Generic Appraisal Guidelines allow for a balance between providing codified, evidence-based analysis and giving space for the professional judgment of the archivist to account for nuances and adapt to contextual differences in individual institutions. To reiterate Lamb's words, which opened this article, "the difficulty is to decide wisely and well what should be destroyed and what should be retained." The complexity and volume of government records guarantee that their appraisal will always be a difficult

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62 While a greater discussion about recordkeeping in the Government of Canada is outside of the scope of this article, an analysis of the effectiveness of the validation process and LAC's relationship with government information management professionals would be welcome.

63 For reflections on accountability in archival appraisal, see Terry Eastwood, "Reflections on the Goal of Archival Appraisal in Democratic Societies," *Archivaria* 54 (Fall 2002): 59–71; and Jim Suderman, "An Accountability Framework for Archival Appraisal" (presented at the 17th Eastern and Southern Africa Regional Branch of the International Council of Archives Conference, Maputo, Mozambique, 22–26 July 2003), in *ESARBICA Journal: Journal of the Eastern and Southern Africa Regional Branch of the International Council on Archives* 23 (2004): 51–61.

task. The development of generic appraisal at LAC has, however, gone a long way toward helping archivists decide wisely and well which records should be retained to serve as the continuing memory of the Government of Canada.

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Jenna Murdock Smith is a senior archivist at Library and Archives Canada, where she has worked in the government records program since 2008. She holds an MA in Public History from Carleton University, Ottawa. From 2013 to 2014, she worked as the lead on LAC's Truth and Reconciliation Commission file. Jenna is currently responsible for records related to the health portfolio and the status of women, and for the development of guidelines and tools related to the government records disposition program. She served as a member of the host team and program committee for the 2017 conference of the Association of Canadian Archivists, held in Ottawa, and was also on the program committee for the 2016 conference in Montreal.