

Government Archives and Certification

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Abstract

Government archives approached their review of the draft audit checklist developed by the RLG/NARA Taskforce on Digital Repository Certification from the perspective of their mission statement, organizational position, relative financial security, and strong commitment to preservation. They found nearly all aspects of the checklist compatible with their data preservation and access programs and endorsed the effort.

General Terms

Management, Measurement, Performance, Security, Standardization, Verification

Keywords

Access, Audit Checklist, Certification, Designated Community, Disaster Planning, Financial Sustainability, Intellectual Property Rights, Succession Planning, Vital Records

1. Introduction

One could assume that government archives at any level with their relatively secure mission, funding, collections, and clientele would not be in the forefront of the movement to support the digital certification program. This has not been the case. Government archives, while raising questions during the review phase, have indicated understanding and support for the digital certification audit checklist. Their concerns have focused on issues unique to government including the issue of succession planning, multiple year funding, and the concept of a “designated community.” They also have raised issues of general concern including intellectual property rights, data ownership, disaster planning, and the burdens associated with a certification audit balanced against the benefits of being certified.

2. Issues Unique to Government Archives

a. Funding. The Audit Checklist, Section A.4, Financial Sustainability, presumes the repository operates on a business model and has business oriented procedures in place to obtain financial support and to regulate how funds are spent and accounted for. Government archives correctly raise the issue that they operate as part of government organizations and are subject to the annual budgeting process. While attempting to work within a business model government archives find it difficult to develop accurate, detailed long range plans or to devise alternate means of funding to close any budget gaps. A typical budget cycle may extend over a few years from planning, to budget request, to approval, to program activity to review of the activity and final reporting.

b. Succession Planning. Typical of government archives, the U.S. National Archives and Records Administration sees its mandate to preserve official records until “the fall of the Republic.” Government archives, therefore, see little relevance to section A1.2 which calls for a formal succession plan in case the repository “ceases to operate or substantially changes its scope. Other types of repositories questioned the potential impact on the confidence level of possible donors of having a defined plan for their demise in place.

c. Data Ownership. A government archives is one type of an “institutional” archives whose primary responsibility is to preserve the designated records of the larger parent institution, in this instance that unit of government. Institutional archives generally have a well established procedure and protocol for transferring full physical and legal custody of the records it receives from the producers (government agencies) to the archives. Contributor based “collecting” archives, such as data libraries, may not be able to establish equally clear title and defined roles for all of the data they acquire. These differing roles have led to differing approaches to this issue within the audit checklist with government archives seeking stronger language requiring clear title to the data and a clear statement of responsibility and duties.

d. The Value of Certification to the Institution. While endorsing the audit checklist and the certification process, many government archives also

understand certification probably will not affect their relationship with their sponsor (their government) or with their producers (the government agencies that must transfer their data to the government archives). Members of the drafting work group include representatives of government agencies with active digital archival or data center programs and experience in the issues addressed in the checklist. At least one government agency noted that it had used the draft audit checklist in planning new digital initiatives.

Observers from government archives recognize that preparing for an external audit, conducting a preliminary self assessment, hosting an audit, and addressing any shortcomings identified in an audit could encumber significant resources (staff time, procedures and funds) for little or no obvious gain. In this vein a government archives could ignore the certification effort and continue its archival activities with undiminished status. To their credit, no government archives that reviewed the draft took this position. Instead they recognized an obligation to provide leadership on this issue, to use the audit as an opportunity to help the community understand the audit process and to achieve certification. They recognized that preservation and customer service are clear parts of their mission worthy of continual examination from a variety of perspectives.

3. Issues Shared with other Repositories

a. Intellectual Property Rights. Government archives may have a narrower perspective on intellectual property rights than other repositories because their collections come from government agencies and are less encumbered with this issue. Their collections, however, are not entirely free from this issue or from other restrictions on access unique to government archives such as security classified records. Government archives recognize that understanding the content of collections, the rights and restrictions encompassed in those collections, license agreements, and the requirements involved in providing access to the data are important to all data managers. Like other data managers they have an understanding of which collections contain which types of rights and restrictions issues.

b. Designated Community. Designated Community, as defined in Section C, refers to both the producer community and the consumer community. Government archives, as publicly funded repositories, generally receive their records from agencies of their level of government and from a small number of donors of closely related information. In turn, as government agencies, they place few restrictions on who may access their holdings within the requirements of the relevant freedom of information, privacy and intellectual rights restrictions that can or must be imposed.

While not at odds with the concept of designated community, most government agencies that have commented on the checklist have noted that the concept does not apply in the same way to either their producers or their consumers. Archival records in the U.S. National Archives and Records Administration, for example, are open, except for records withheld under the Freedom of Information Act or other valid restrictions, to any researcher fourteen years of age or older with a research topic that necessitates access to the collections.

c. Disaster Preparedness. While government archives share this concern with all data repositories, they may have a greater sense of concern regarding this issue given their preeminent position in the archival community, the significance of their collections, and the expectations that they will provide leadership in this area. As the draft audit checklist establishes, best practice in this area is to have multiple copies of the data stored in separate locations sufficiently separated that they will not suffer from the same disaster. Since 1970 the U.S. National Archives and Records Administration, for example, has followed best practice and created both a preservation master and a preservation backup copy of all of its data and stored them in separate locations. The Request for Proposals for the Electronic Records Archives, currently under development, mandated a minimum 100 mile separation between those two copies for the new system.

This preservation activity is separate from, but closely related to, vital records activities that store records required for continuity of operations at a remote location. Vital records are replaced with a set frequency to maintain their currency.

d. Communities of Interest. Digital records have brought about the convergence of interests between archivists, librarians, and data custodians. All are concerned with data. All express a desire to provide long-term access to their data. All proclaim a mandate to preserve their data holdings into the indefinite future. In developing the draft audit checklist the taskforce realized that even when speaking the same words the communities often had different meanings or nuances associated with the words used to describe custodial activities. To a data custodian an annual data transfer failure rate of .0001 may be considered successful while an archivist would be unsatisfied with anything less than 100% success.

The audit checklist is designed to establish the standards used to measure all repository activities, to reduce them to written standards and procedures, to prompt their examination, and to determine appropriate measures to measure "success." It also is designed to standardize the terminology and the understanding of the terminology.

e. Pass/Fail Rate. Several respondents commenting on the draft audit checklist, including, respondents representing government archives, raised questions and concerns about what constituted a passing grade for the checklist. How rigorous would the process be? Was the expectation that the majority of repositories would pass or fail?

While there may be some latitude in how an auditor conducts the audit, the real predictor of whether a repository will be successful will be their own self evaluation and the resulting measures they take to address issues highlighted during the self evaluation. The information a repository presents to an auditor regarding any particular audit checklist point will come, in part from existing procedures and reports. It may come, in part, from new processes created to fill a gap revealed by the self audit. For some checklist points the correct answer may be “it depends.” Different repositories may provide different, equally valid responses based on their mission, structure, enabling legislation, procedures, community, and dissemination policies. Different environments could create different “correct” answers.

Within the government archives community some respondents raised the question of whether national archives would be held to a “higher standard” than regional or local government archives. The answer is no.

f. Commitment to Preservation. Government archives, with a strong stated commitment to the preservation of their holdings, reacted positively to the strong central position given to data preservation in Sections B2 and B3 of the draft audit checklist. Several national archives and national libraries in the United States and Europe are developing large scale digital preservation projects that reflect their commitment to digital preservation. They also can

promote compliance with the audit checklist as part of the system development activities for agencies within their level of government as they promote records management activities.

g. Omissions. Government archives commented on the lack of audit checklist criteria relating to “deaccessioning” – the process of removing data from the collection because it no longer meets the repository’s mission statement or collection policy or it can not longer be preserved from a technical perspective.

At least one critic observed that no member of the working group was from Canada, Australia, New Zealand where there is greater emphasis on the “continuum” approach to archival theory and processing. The taskforce, however, has not received any comments from archives in these countries. The continuum approach differs on who will perform the long-term preservation and access responsibilities more than what those duties will be.

4. Conclusion

Government archives, like other institutional archival programs, reflect a stronger preservation heritage and a commitment to equal access. As government archives they have the broadest definition of designated community and serve a diverse consumer base. They tend to have clearer legal title to all of their holdings than contributor based repositories. They also tend to have fewer intellectual property rights issues or other restrictions on access to their data. While they could continue to function with the full faith and confidence of their sponsor, their producers, and their consumers without participating in the audit checklist process, government archives recognize the value of the process, the leadership position they occupy, and the broader value to be gained from their participation in a successful audit checklist process.