

Government Record News

The Newsletter of the Government Records Section
of the Society of American Archivists

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From the Chair

Dear Colleague:

This is the first issue of the 2000 - 2001 Government Records Section Newsletter. My name is Jim Cassedy, and it is my privilege to serve as Chair of the Section until the next SAA meeting in Washington, DC (August 27 - September 2, 2001). The other officers of our Section include Ms. Jelain Chubb of the Missouri State Archives, who is also Vice-Chair of the Section, Mr. Archie DiFante of the Air Force Historical Research Agency, Ms. Kimberly A. Cumber of the North Carolina State Department of Cultural Resources, Ms. Diana Banning of the City of Portland, Oregon, and Ms. Leonora A. Gidlund of the Municipal Archives of the City of New York. Contact information and terms of service for my colleagues are to be found elsewhere in this newsletter.

Mr. Timothy Johnson of the University of Minnesota johns976@tc.umn.edu has agreed to take on the job of Newsletter Editor. In this issue of the Government Records Section Newsletter, you will find, I think, several outstanding articles from members of our Section. These articles include submissions by Ms. Brenda Pietrowski and Mr. Archie DiFante of the Air Force Historical Research Agency, and Ms. Leonora Gidlund of the Municipal Archives of New York City. All of these individuals made outstanding presentations at the Government Records Section Meeting held during SAA/Denver.

Mr. Charles L. Rodgers of the Minnesota Historical Society contributed an excellent article on the Society's Information Policy Project. I urge you all to follow the example set by Charles Rodgers, and share with us the good work that you all are doing, by contributing an article to the next issue of the Government Records Section Newsletter, which we hope to put out in the Spring of 2001.

In addition to the aforementioned articles, we are also publishing the Government Section

Newsletter By-Laws, written by former Chair Lynn Gamma, and approved by the Section during our meeting in Denver. Many thanks to Lynn for providing a sound “legal” basis for the Section.

Building upon Lynn’s good work, it is this years’ goal to increase our communication capability within the Government Records Section. Our ability to increase our communications internally will be dependent upon e-mail, and the World Wide Web.

Earlier this year (September 27, 2000), I attempted to send an e-mail message to all Section members for whom I had e-mail addresses. Unfortunately I do not have all the e-mail addresses of our members, and there are some addresses which did not work. If you have not previously heard from me, and wish to be part of the Sections efforts to increase our communications via e-mail, please contact me at james.cassedy@arch2.nara.gov, or at 301-713-7110, x. 258.

At the suggestion of Mr. Dave Hastings of the Washington State Archives, the Section has set up a “Listserve,” entitled Governmentrecords, with e-groups. The listserve was begun in early November by entering the names of Section members for whom I had e-mail addresses, and many of those contacted have joined this group.

If you have not previously heard from e-groups, and wish to join our listserve, please go to <http://www.e-groups.com/group/Governmentrecords>.

In addition, we have set up a Web Page at <http://www.governmentrecordssection.org>. I am very pleased to announce that Ms. Anita Doering of the La Crosse, Wisconsin, Public Library, has agreed to set up the page, and that it is up and running. We are hoping to turn this page into a useful source of information for members of the Government Records Section.

Please take a look at the site, which is currently hosted by a “free” commercial host, Anglefire. Suggestions are appreciated.

These efforts are at an early stage. Therefore it may be sometime before some of the “bugs” are worked out of our system, and we have a more or less smooth operation. Thanks for your patience.

If you have questions, suggestions, criticisms, or other comments made for the good of the Government Records Section, please do not hesitate to contact me, or another member of the Steering Committee. The Section genuinely seeks the support of all its members.

Best Regards,

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Implementing Executive Order 12958 at the Air Force Historical Research Agency



By Archie DiFant and Brenda Pietrowski

The Beginning

The Air Force Historical Research Agency (Safe Paper Office) has had an active review for declassification policy since the seventies. The change in the Executive branch of the government (1993) began with rumblings of the need for a new and less restrictive way of reviewing, protecting, and classifying information. Changes in the rules about what should or should not be classified are usually influenced by the political affiliation of the President in office. President Clinton became president in January 1993; by 1994, we knew an Executive Order was on the way. Our plans began over a year prior to the actual signing of the Executive Order. We were asked about our needs to do the job, we responded about the ideal additions and enhancements that would have the job easier. We were lucky to have the assistance of not only our organization, but also, the Secretary of the Air Force, Declassification Group for most of our requirements. One of our most important concerns was the need for additional manpower. This was accomplished through our use of reservists.

Planning

Some of the most important parts in designing our program were:

- Survey the collection: Classified information at the Agency is maintained with unclassified information. We have a database, but most of the information has not been indexed. The only way to get a true idea about what we would be doing was to go box-by-box, reel-by-reel, and tape-by-tape. We, along with two reservists divided up the collection and then we started pulling and counting classified information. We did not use the linear feet concept, but rather decided to go with using a page count. This decision was based on the decree that came from above that they wanted a page count. After three weeks, we came up with approximately 18 million pages for review. The survey also was used to determine the risk factor of the information and its place in our review schedule. We decided at the outset that we wanted to get the high-risk information out of the way first.
- Training for Reviewers: We were working with the Secretary of the Air Force Declassification group who had been involved in reviewing the Southeast Asia (Viet Nam) information. They provided the initial and ongoing training for Archie and me. Eventually, we also participated as trainers in the training for reviewers. We also were lucky enough to be able to attend the DOD Security Information course. We had the situation, where with reviewers, Archie and I were the permanent factor and the reservists came and went with a revolving door effect. We did find that eventually hands-on

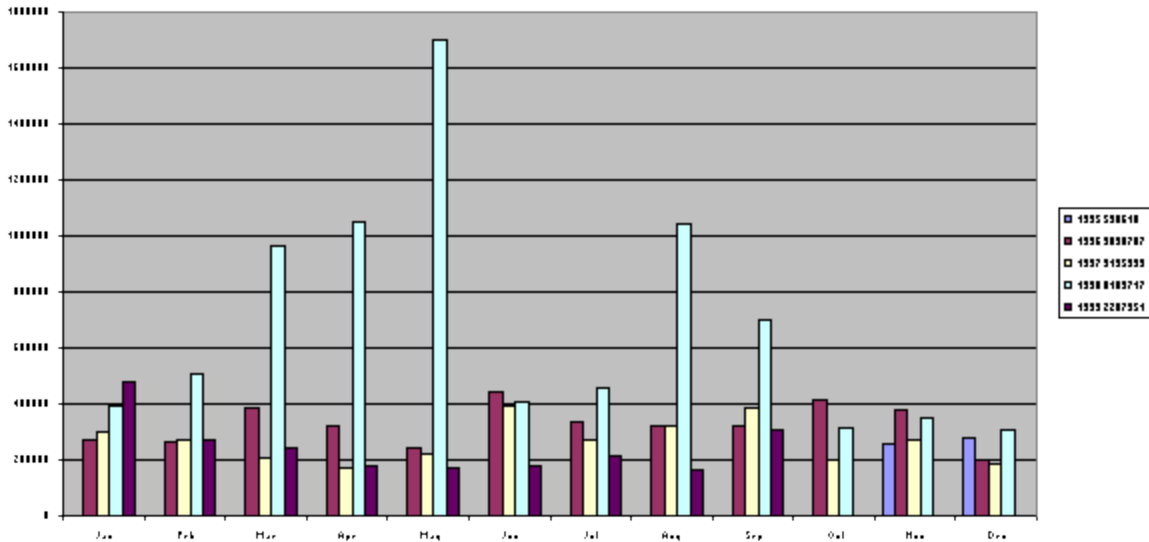
training was the best method to get our reviewers started.

- **Guidance:** Before we began the Executive Order review we had to wait for the implementation order to come through. The EO listed the nine factors to consider for exemption and we used other declassification manuals in our review.
- **Plan of Action:** We knew from the beginning that the review would be trial and error and that we had to be flexible in our procedures and documentation. We were open to better ways to review and looked for way to improve our review procedures, guidance, and record keeping.
- **Possible Problem Areas:** we are Air Force information reviewers; but we have in our collection, information from other services, foreign countries, and other departments within the Executive Branch. When we sought advice on reviewing other information we were usually given the answer “No you can not review our material.” Which then came down to a review for Air Force information and a label indicating that we did not have the authority to declassify the information. When we began making our plan of action for review, we found that quite a few systems and information belonged to organizations that no longer existed and there were no takers on accepting responsibility for the classified information. We did try to anticipate potential problems; we did not always succeed in that planning. And some authorization that we thought had been given was in fact not given. These were mostly just considered a nuisance rather than a problem.

Implementation

We knew that the signing of Executive Order 12958 would propel us into a fast track environment within the first six months of actual implementation. The Executive Order was signed in April of 1995, but the actual implementation order was not signed until November 1995. Our initial plan was to use the first year for developing our process, training our reviewers, and fine-tuning our plans. Instead on 1 November 1995, we began reviewing! Our review involved only the official Air Force information we have at the Agency; but, as a rule, not the information we protect for other agencies, foreign countries, and services. Most of these entities were and continue to be very protective of their information. (Security language for “Don’t Touch It.”)

By the end of the first year, the Top Secret and high-risk information we protect was drastically reduced. Years Two through Five (1996-2000) consisted of pulling Hollinger boxes and doing an item by item review. Here is how we did:



Added all together, the sum is 18,029,790 pages reviewed, and completed in September 1999 not November 2000

Conclusion

Lessons Learned:

- Know your collection.
- Care about your collection. If you have to bring in reviewers from outside your agency, make sure they understand the importance of the provenance of the records and have a real respect for the collection.
- Get going, but be flexible to make changes when and where they are needed.

We have completed the first phase of Executive Order 12958, however, we began some of the next phase at the same time we completed phase one. The next phase is reviewing documents dated prior to 1977 and our unaccessioned records.

NYC Department of Finance Tax Assessment Photographs, ca. 1940

By Leonora Gidlund

During the 2000 SAA Government Records Section meeting, Leonora Gidlund, Deputy Director of the New York City Municipal Archives, described their popular photo collection generated by the Department of Finance. Every five years, the Department of Finance assigns photographers to take images of the facades of buildings within the five boroughs of New York to provide information to the Tax Assessment Bureau. A small photo is attached to an index card containing the building record and the negatives are placed in storage.

The Archives had in storage 22 cubic feet of records containing an almost complete set of negatives, more than 720,000 images, taken during 1940. They showed virtually every building then standing: a visual representation of New York City more than 60 years ago. The Archives could not provide access because the negatives were on 35 mm nitrate film. These black and white negatives, arranged by borough, were housed in small metal containers with a catalog number written on the lid. There was also a corresponding paper index for each borough which related to the container catalog number.

In 1990, Ken Cobb, Director of the Archives, started to write grant proposals to fund a transfer to safety film. Eventually, the Archives received monies from five different sources, NEH, NHPRC, The NYS Library Conservation Program, and the Andy Warhol Foundation about \$450,000. The nitrate film was transferred by Western Cine (Colorado) a vendor that worked primarily with the preservation of motion picture film. The nitrate film transfer was treated as motion picture film and transferred to fine grain positive on the large rolls. A new negative was cut to microfilm rolls and a second positive was also placed on microfilm rolls. A duplicate was made from the second positive and that is what the researchers use in the Reference Room. The prints, usually, 8 inches x 10 inches, are made from the new negative. The fine grain copy (archival copy) is stored off-site.

The transfer took 4 years: the first borough selected was Staten Island because it contained the fewest images. It was a test pilot project. After that, Manhattan followed and then the remaining boroughs. The project was completed in 1994.

The nitrate film was not destroyed. The Archives staff decided to store the original film in an on-site commercial freezer. Western Cine had transferred the nitrate to large reels. The reels were placed in Marvel Seal (foil on one side, plastic on the other) and heat was used to seal the bag. The bag was then placed in a plastic zip-lock bag.

The safety film is now available and researchers are delighted and often surprised with the images. Microfilm makes it easy to stroll through neighborhoods, forgotten or never known. Historic preservationists, community activists, historians, genealogists, and the public have found the photographs very useful. Researchers can have a copy of the microfilm image for \$0.50 or a copy print (8x10) for \$25.00. Although the quality varies, the majority of prints are good.

Information Policy Project at the Minnesota State Archives

By Charles L. Rodgers, of the State Archives Dept., Minnesota Historical Society

In January of 1999, The Minnesota Legislature's Information Policy Task Force issued a report that included a number of recommendations for government to consider. Among those that were enacted in the session was one asking the State Archives to examine certain programs that support information policy and certain topics of pressing interest. The State Archives defined those principally as records management, electronic records and the special record keeping needs of local government.

Information technology is changing the way that government operates and the people and entities storing, using and providing access to government records will have to change, too. Through the Information Policy Project, the State Archives has developed, and continues to develop, practical tools for the State Archives and its constituencies, and to identify the means to ensure the continued safeguarding of Minnesota's documentary heritage.

Last year the State Archives held several focus groups to gather information from records management staff of state, county, and local government agencies; county historical societies' staff and volunteers; county and local government officials; and staff from the Information Policy Analysis Division of the state Department of Administration. The goal of the focus groups was to start a dialogue with various constituencies: record creators, records users, and records custodians. The meetings helped determine what the participants' needs and expectations were, what kinds of tools and resources were necessary, and the best ways to provide suggested tools and resources.

An initial supposition proved correct: at all levels, there is a wide disparity of needs and limited resources to manage, preserve and provide access to government records. Given that, the State Archives determined the best course is to focus on a number of specific projects and steps that will immediately address the needs of record keeping in government. This will include a continuing emphasis on providing education and educational resources.

During the past eighteen months the State Archives has developed the following tools and resources:

- Digital Imaging FAQ
- Legal Issues FAQ
- Trustworthy Information Systems Handbook
- Legal Risk Analysis Tool
- Appraisal Guidelines
- Disaster Preparedness Guidelines
- Storage Guidelines

In September and October of 2000 State Archives Department staff were on the road providing valuable information about preserving and managing government records to county and local historical societies, and local government officials. Staff conducted all-day workshops in Tofta, Rochester and New Ulm that included sessions about appraisal, storage and conservation, description, the state records laws, and information technology. Ben Bloom, Mike Ehlert, Bob Horton, Jennifer Johnson, Charles Rodgers and Shawn Rounds conducted the workshops. While State Archives Department staff has often been invited to conferences and workshops to give presentations, this was the first time the staff sponsored and conducted workshops on their own. The workshops stressed collaboration in caring for government records, and emphasized sustainable programs and appropriate practices. Participants were introduced to the larger issues in records preservation, and said they valued the information they received. Possibly the workshops will be repeated in the spring of 2001 at different locations.

State Archives staff was pleased with the turnout, and are now developing an on-line manual

about managing and preserving government records with historical value. The manual will be linked to the tools and resources the State Archives has developed, and on-line resources and information available from the National Archives, other state archives, and related professional associations. Unless further funding is continued, the Information Policy Project will be completed in June 2001. For more information about the project, and to view the resources and tools developed by the Minnesota State Archives please check its web site at: <http://www.mnhs.org/preserve/records/index.html>

Bylaws of the Government Records Section of the Society of American Archivists

I. Membership

Membership in the Government Records Section of the Society of American Archivists is open to any member of SAA who has an interest in government records issues.

II. Officers

The officers of the Government Records Section shall be the chair, vice chair, and newsletter editor. Only members of SAA and the Government Records Section may serve as officers of the Section. A new vice chair shall be elected at each annual meeting of the Section and shall serve for one year as vice chair, succeeding automatically to the office of chair for the subsequent year. If for any reason the vice chair is unable to succeed to the office of chair, a new chair shall be elected following the same procedures as for election of the vice chair. The newsletter editor shall be appointed by the chair, with the advice of the Steering Committee, for a term of two years, which may be renewed indefinitely. Both a chair and a vice chair shall be elected in the first election following the approval of these bylaws. The chair shall preside at all meetings of the Section and the Steering Committee; represent the Section in its relations with SAA in general and with the Council and other groups within SAA; serve on SAA committees, tasks forces, etc. as an ex-officio member when required or appoint a representative to do so; appoint Section committees as needed; and submit an annual report of Section activities to the SAA executive office. The vice chair shall serve as acting chair in the absence of the chair. The newsletter editor is responsible for issuing three newsletters annually to the Section membership.

III. Steering Committee

The Steering Committee shall consist of the officers and four members. The members shall serve two-year terms, two members being elected at each annual meeting with additional members elected if for any reason unexpired terms need to be filled. The profile of the Steering Committee shall consist of two representatives of local government, two representatives of state government and two representatives of federal government. The Steering Committee shall serve in an advisory capacity to the chair and its members may be assigned specific responsibilities by the chair. The Steering Committee shall plan each annual meeting of the Section.

IV. Election of Officers and Steering Committee

There shall be a Nominating and Elections Committee consisting of the immediate past chair of the Section (serving as chair of the Committee) and the two Steering Committee members whose terms are not expiring at the conclusion of the next annual meeting. Utilizing an announcement in the newsletter issued by the Section chair, this Committee shall solicit from the Section members the names of volunteers or persons recommended for the positions to be filled in the next election. All persons whose names are submitted to the Committee or proposed by the Committee itself shall be considered nominees if they agree to have their names placed in nomination and are members of SAA and the Section. The Committee shall be responsible for ensuring that there is at least one nominee for the position of vice chair and that the number of nominees for membership on the Steering Committee is not less than the number of positions to be filled. The Nominating and Elections Committee shall announce the nominees to the membership of the Section in the last newsletter issued before the Annual Meeting. Additional nominations may be made from the floor at the Meeting. Any member of the Section who is unable to attend the Annual Meeting may request an absentee ballot from the chair of the Nominating and Elections Committee; such ballots must be returned to the chair of the Committee prior to the Annual Meeting. Voting at the Annual Meeting shall be by secret ballot if there are more nominees than can be elected; only members of the Section may vote. The Nominating and Elections Committee shall be responsible for tabulating and announcing the results of the election. A simple majority of the votes cast shall be required for election to vice chair. Members of the Section may vote for as many nominees for member of the Steering Committee as there are positions to be filled and the nominees receiving the highest number of votes shall be elected. Elected officers and Steering Committee members shall assume office at the conclusion of the Annual Meeting of the Section.

V. Meetings

The Government Records Section shall meet once a year at the annual SAA meeting at the time and place scheduled by the SAA program committee and executive office. Additional meetings of the entire membership of the Steering Committee may be scheduled by the chair if needed to carry out the business of the Section.

VI. Amendments

Any member of the Government Records Section may propose amendments to these bylaws. Proposed amendments must be submitted in writing to the chair. The chair shall distribute proposed amendments to the membership through the last Section newsletter prior to the Annual Meeting and voting on the proposed amendments shall be by secret ballot at the Annual Meeting. A two-thirds majority of votes cast shall be required to amend these bylaws. Any member of the Section who is unable to attend the Annual Meeting may request an absentee ballot from the chair, such ballots must be returned to the chair prior to the Annual Meeting.

VII. Enactment

These bylaws shall be distributed to the membership of the section with a mail ballot for their approval or rejection. They shall become effective immediately if approved by a majority of the votes cast by the deadline set for the return of the ballots.

National Archives Assembly

In July 2000, the National Archives Assembly, a professional organization whose membership includes current and former members of the National Archives and Records Administration, passed and sent a resolution to Mr. John Carlin, Archivist of the United States. The Resolution concerned the disposition of the Department of Commerce, Bureau of the Census, Census 2000 Image Files. The Archivist responded to the Assembly's Resolution on October 23, 2000. We are publishing both documents below.

I think these documents will be of interest to many government archivists, concerned as we are with the appraisal process, electronic records, and the environment in which government archivists work. The Resolution was previously published on the Archives List serve, and the letter from Mr. Carlin was distributed to members of the National Archives Assembly. There has been some commentary on this issue in newsletters and journals concerned with archival and records management issues, for instance in the Micrographics and Hybrid Imaging Systems Newsletter Vol. 32, Number 7 (July 2000).

Further information concerning this issue will be found by searching the Web Site of NARA at www.nara.gov, and also by reviewing the Federal Register, which is accessible through the NARA web site.

Jim Cassedy
Chair, Government Records Section
SAA

THE NATIONAL ARCHIVES ASSEMBLY
The National Archives at College Park
8601 Adelphi Road, College Park, MD 20740-6001

Resolution Regarding the Disposition of the Census 2000 Image Files

WHEREAS the Assembly recognizes the sole authority of the Archivist to determine the disposition of Federal records and defers to his judgment on how to balance archival decisions against the realities of external pressures and considerations, and

WHEREAS the personal information with enduring value provided in response to the 2000 Decennial Census, the Individual Census Record File, has been scheduled for transfer to NARA for permanent retention, and

WHEREAS the Assembly has concerns about the Volume implications of accessioning approximately 700 million images either in digital form or on microfilm, and

WHEREAS the Assembly has concerns about the Volume implications of accessioning approximately 160 Terabytes of redundant data which could potentially translate into more than two million tape cartridges, and

WHEREAS the Assembly has concerns about the Budgetary Implications of preserving this redundant data, specifically the inability to determine the exact cost of archival retention because no one has ever attempted to preserve and maintain a collection of this magnitude, and

WHEREAS the Assembly has concerns about the Interspersion of Valueless Material within the redundant images because an estimated two-thirds of the images (or as many as 500 million) are of forms containing no respondent data, and

WHEREAS the Assembly has concerns about the misunderstanding of the issue of Marginalia, and,

WHEREAS the Assembly has concerns about the misunderstanding of the issue of Handwriting Analysis, and

WHEREAS the Assembly has concerns that the normal procedures involving stakeholder review and comment were not followed in the processing of N1-029-00-004. Therefore, the Assembly does not believe the Archivist was able to make a fully informed decision.

THEREFORE BE IT RESOLVED that the Executive Board of the National Archives Assembly urges the Archivist to revisit the appraisal decision making the digital image files from Census 2000 a permanent record.

In accordance with the Constitution of the National Archives Assembly, this resolution was adopted by a simple majority of the members of the Executive Board of the National Archives Assembly on July 20, 2000.

BACKGROUND

The National Archives Assembly is an organization of present and former NARA employees who support the development of NARA as the leading archival institution in the world. The Assembly provides a forum for employee communication on NARA policies and programs and serves to convey its members' views to the Archivist of the United States. The National Archives Assembly Executive Board has adopted this resolution to express serious reservations about a recent decision concerning the disposition of Census 2000 long and short form images. The information contained in this document identifies specific concerns related to the appraisal of the census image files as a permanent record.

Beginning in 1994, thirteen NARA staff collaborated with representatives of the Census Bureau at the "front end" of the records life cycle to develop requirements for and identify the best products from the 2000 Census that would meet the needs of the genealogical, social science, and other research communities. In its report of March 1, 1995, titled "Preserving Census 2000 Records: A Report of the Census 2000 Working Group of the National Archives and Records Administration" NARA recommended the creation of an electronic file containing individual responses to the census in a format that specifically meets NARA's transfer and preservation requirements, as a desired "product" from the 2000 Census. Computer output microfilm of the images was identified as a potentially desirable product, but not required because the Census Bureau was not planning to create microfilm in the course of its conducting Census 2000. The Census Bureau worked from that point on under the impression that they were meeting the needs of NARA and future generations of researchers by budgeting for, preparing, and eventually arranging for transfer an electronic file known as the Individual Census Record File (ICRF) and other permanent records.

All required data collected on the Census forms, both handwritten and check box, are captured in

the ICRF using sophisticated Optical Character Recognition/Optical Mark Recognition technologies operating at over 99% accuracy rates. Incomplete or inaccurate responses are verified by Census Bureau staff and entered directly into the ICRF. The ICRF is scheduled as a permanent record on N1-029-00-001, item 3. NARA appraised the ICRF as permanent because it is the final checked, edited and verified permanent record of individual responses to Census 2000 and because it reflects the basic record upon which the Bureau of the Census will base its tabulations of the 2000 Census. The ICRF is also the record citizens will use for the protection of their legal rights and interests through the Census Age Search program, until the records are open in 2072.

Schedule N1-029-00-001 also included items covering the paper forms (item 1) on which the data was originally collected and the image files (item 2). The schedule listed both items as temporary. The item describing the images was included to illustrate that they are essentially an intermediate processing stage in the compilation of the final checked, edited and verified individual Census 2000 data captured in the ICRF. Intermediate processing files have been disposable under GRS 20 since 1972. NARA requested that the Census Bureau withdraw the item to allow NARA to complete a full and detailed appraisal. The availability of this schedule was announced in the Federal Register of December 13, 1999. NARA received several comments urging the retention of the images.

On December 7, 1999, NARA received a new schedule, N1-029-00-002, from the Bureau of the Census proposing the images of the Census 2000 for disposal after 10 years. A team of NARA archivists reviewed this proposed disposition and, after extensive analysis, recommended temporary retention of the records based on the following appraisal criteria: the information in the records was already scheduled as permanent in the ICRF, the existence of populations not covered or incompletely covered by the scanned images (i.e. group quarters and other populations will not have associated images), the interspersion of blank pages containing valueless information (estimated to be 2/3 of all images), and the lack of an index or the ability to retrieve images by personal identifier. The complete original appraisal of the Census 2000 images is contained in N1-029-00-002.

On March 6, 2000, NARA announced the availability of the schedule and appraisal of the images in the Federal Register and also directly solicited comments from a number of genealogical, social science, and public policy groups. The comment period closed on May 22, 2000. In response to both schedules (N1-029-00-001 and N1-029-00-002), NARA received comments from total of 13 unique entities, including two members of congress (Congressmen Jim Turner and Henry Waxman). Most of these parties urged the retention of the images primarily because images of original schedules from all previous censuses are available, because images of Census 2000 forms will contain marginalia not otherwise captured in the ICRF, and to allow for future analysis of the handwriting included on the forms.

As part of its detailed analysis of the image files, the appraisal report on N1-029-00-002 addressed the comments received in response to N1-029-00-001. The report states that "it appeared to the appraisal team that most commenters presumed that the scanned image files were similar to, or would serve as a replacement for, the microfilm census records that NARA has appraised as permanently valuable for previous decennial censuses." Apparently, the

commenters did not understand that the recordkeeping system developed for the 2000 census was qualitatively different than the systems used for earlier censuses. The permanent records of individual responses to Census 2000 are in the ICRF, not the image file.

However, NARA responded to public comment by reversing its appraisal of the image files with this justification:

Based on our analysis of the public comments, and following internal NARA review and informal discussions with staff at the Census Bureau and at the General Accounting Office (GAO), we recommend that the image files be retained permanently and transferred to NARA when they are ten years old. The scanned image files will contain information that will not be duplicated in the Individual Census Record File (ICRF) * such as marginal comments. While estimates of the actual number of marginal comments that might be found on the questionnaires vary widely, our discussions suggest that as many as [sic] 1 form in 1,000 may have [sic] contain such comments. * We also confirmed with the Census Bureau and GAO that it is technically feasible to develop an [sic] computer system that is capable of linking the scanned images to a unique Housing Unit Identification Number, and further by person, address, and other geographic coding. While these links currently do not exist, based on conversations with NH by John Constance [NARA's Congressional Affairs officer], it is our opinion that the index files necessary for researchers to access the scanned images can be developed at the appropriate time. We will also explore other ways to work cooperatively with the Census Bureau to develop the index links and resolve any technical issues relating to the scanned image files prior to their transfer to NARA.

The appraisal for the images is dated May 18, 2000. The schedule was logged on May 24, 2000, and assigned job number N1-029-00-004. The appraisal dossier contains the records schedule, the NA Form 13133, a transmittal memo for the appraisal report, a two page appraisal report, summaries of all of the public comments which were received, and a copy of a letter dated May 17, 1999, from the Assistant Archivist, Office of Records Services-Washington, D.C. to Congressman Henry Waxman. This purpose of the letter is to inform Mr. Waxman that the Assistant Archivist is planning to recommend permanent retention of the image files to the Archivist. This letter also states that "We will coordinate all of the details of the disposition language and our final recommendations to the Archivist with David McMillan of the Committee staff." On June 7, 2000, the Archivist of the United States signed records disposition schedule N1-029-00-004, authorizing the permanent retention of the image files from the 2000 Census.

SUPPORTING INFORMATION FOR THE RESOLUTION

VOLUME AND COSTS: The disposition of the records created and used to document the Census 2000 is an important issue for NARA. One of the series of records, which have generated enormous interest, are the scanned images of the long and short forms that were returned by individual households. On June 7, 2000, the Archivist of the United States signed records disposition schedule N1-029-00-004, authorizing the permanent retention of the image files from the 2000 Census. The Census Bureau estimates there are more than 700 million images. NARA's current holdings are estimated at 4 billion documents --- this decision alone essentially increases

the volume of NARA's total holdings by 17.5%.

The only approved options currently available for the transfer of electronic records, including scanned images, are 9-track tape, 3480-class tape cartridge and CD-ROM (ref. 36 CFR 1228). Given that recent Census estimates suggest the volume of images to be approximately 160 terabytes, and that CD-ROMs hold the greatest volume of electronic records files (approximately 600 megabytes), NARA should expect to receive approximately 320,000 CD-ROMs. Opting for either 9-track, 6250 bpi magnetic tape or 3480-class tape cartridge would result in over 1 million transfer media. NARA's current electronic records preservation procedures call for creating separate master and backup copies onto 3480-class tape cartridge. Therefore, under NARA's current preservation procedures, NARA will have to procure over 2 million 3480-class tape cartridges.

If microfilm is identified as the desired transfer or preservation media, the cost to create such microfilm should be considered. The cost may reasonably approach \$.10 per image for one copy, or \$70 million. No organization has ever faced microfilming at such huge volumes, so no one can be certain of the exact costs or the potential impact on the environment from the generation of such huge amounts of chemical byproducts. If NARA requires that the Census Bureau meet 36 CFR 1230 (requiring a silver halide original and diazo backup), then the costs could potentially double and NARA, if the microfilm is created with 1,000 images per reel for example, would face accessioning 1.4 million reels.

The original appraisal included an estimated volume of Census 2000 scanned images of approximately 60 terabytes. NARA's imaging experts were asked to provide the estimated costs for maintaining that volume. The response preliminarily estimated that it would cost "\$5.3 million to \$10.5 million per year (\$53 million to \$105 million for the first 10 years) for this amount of data." Given that the Bureau of the Census has now revised this estimate upwards to 160 terabytes, and if we assume the costs to increase proportionately to volume, NARA could expect the annual cost to maintain the Census 2000 images at \$14.31 million to \$28.4 million per year (\$143.1 million to \$284 million for the first 10 years) for this amount of data. The cost for currently acceptable preservation media alone is approximately \$8 million at \$4.00 per 3480-class tape cartridge. However, a caveat must be placed on these cost figures. Specifically, no archival repository has ever faced accessioning and preserving such a large volume of images and costs are based on projects of a limited scope. We do know however that costs of some order of magnitude not normally associated with the archival preservation of electronic records will be associated with the permanent preservation and migration of the image files.

INTERSPERSION OF VALUELESS MATERIAL: The Bureau of the Census necessarily image processes every page of every form returned to it regardless of whether the return is completely filled out. In other words, the 2000 Census long form is approximately 20 pages in length with space for six respondents. If there is only one respondent in the household, all pages in the long form will be image scanned into the system. The Census 2000 image processing system necessarily requires that all pages be imaged in order to extract the data from the forms. The Bureau of the Census estimates that 2/3 of the images contain no information. Therefore, NARA can expect to have among its archival holdings almost 500 million images of blank forms.

MARGINALIA & HANDWRITING ANALYSIS: One of the arguments included in the public comments is that the Census 2000 forms will contain a great deal of valuable marginalia and will be necessary for future researchers to conduct handwriting analysis. The Bureau of the Census was unable to provide NARA with specific figures based on previous censuses or on the Census 2000 Dress Rehearsal to indicate the extent to which marginalia is on the forms. There is no evidence for the statement that 1 in 1,000 forms contain marginalia. The earliest Census in which respondents had an opportunity to write marginalia on census forms was 1970, the first "mail out, mail back" census [the 1960 Census was a "mail out-enumerator pickup" census]. No entity has reviewed or analyzed the 1970 or later censuses for such marginalia. In addition, the Bureau of the Census estimates that the percent of forms directly returned by respondents to be 66% of the total; census field enumerators would gather the remaining responses. Therefore, marginal comments would only be possible on 2/3 of the forms.

Another argument included in the public comments is that the images need to be retained for future handwriting analysis. In addition to the fact that only 66% of the forms were potentially filled out by the respondent, there is no opportunity to write on the form other than in block printing. Graphology, or handwriting analysis, is the study of handwriting shapes and patterns to determine the personality and behavior of the writer. Given the paucity of written items on the census forms and that only block printing is allowed, and that the specific respondent to the questions is never identified, it is questionable whether the public's comments should have received as much weight as they apparently did.

DOCUMENTATION: NARA's normal appraisal procedures include provisions for the circulation of new disposition schedules and appraisal reports to various stakeholder units for review and comment. These procedures allow for the creation and preservation of adequate and proper documentation regarding appraisal decisions, in keeping with basic tenets of the Federal Records Act (44 USC 3101). This appraisal was not circulated to any NW or NR custodial unit for review or comment. Therefore, the official record does not contain any objections or concerns from the custodial units.

NARA makes its appraisal judgments based on the content, context and structure of records and whether records have enduring informational or evidential value. Several factors weigh in on such decisions including the records' uniqueness, completeness, and volume. Other factors influencing the appraisal decision are of a technical nature and include hardware and software dependencies, media, data compression, significant cost or resources impacts, or other technical issues. The dossier for N1-029-00-004 does not contain either a formal or informal technical analysis of the Census 2000 images. The official record also does not address budgetary implications, interspersions of valueless material, or a substantive analysis and verification of concerns expressed in the public comments. Because these issues are not addressed in the appraisal dossier and, therefore were not brought to the Archivist's attention, he could not consider them.

Ms. Lisa Haralampus
President
National Archives Assembly
National Archives at College Park

NHP, Room 3200
8601 Adelphi Road
College Park, MD 20740-6001

Dear Ms. Haralampus,

This letter is in response to the National Archives Assembly resolution of July 20, 2000, concerning the scheduling, long-term storage, and preservation of Census 2000 records. I appreciate the concerns that the Assembly resolution identified in requesting that NARA to revisit the appraisal decision making the digital image files a permanent record. I would like to bring you, the Executive Board, and members of the Assembly up to date on our discussions with the Census Bureau regarding the preservation of scanned images of the Census 2000 questionnaires. The scanned images are currently maintained in digital format on magnetic tape, and were approved as permanently valuable records in record schedule number N1-29-00-04. My decision was made following extensive comments from a wide variety of professional groups and organizations representing historical, genealogical, statistical, public data, and social science research associations, as well as from the Congress.

For the last several months, we have been discussing with the Census Bureau the feasibility of converting the digital image files (approximately 200 terabytes of data) to Computer Output Microform (COM). On August 10 we received a preliminary proposal from the Census Bureau to convert all of these digital images to COM. After extensive NARA review, and following discussions with the Census Bureau relating to a number of technical issues relating to the conversion project, we have accepted the Census Bureau's proposal. Both NARA and the Census Bureau agree that COM has many advantages as an interim or long-term storage format for preserving the information in the digital image files until it can be released to the public in 2072.

We agree that COM is a widely recognized and reliable preservation format for the storage of permanently valuable information, and national and international standards for the creation and maintenance of COM are well defined and recognized. NARA maintains all individual census response information from 1790 to the present in microfilm format, and we have a long and successful record of preserving microfilm under strict environmental standards, and making it available to the public. It is feasible to convert microfilm images back into digital formats using current technology. This "blowback" technology could presumably be used to convert the Census 2000 COM images back into digital image files should that be the preferred method of access when the records are made available to researchers in 2072.

We are currently assisting the Census Bureau in developing a professional and measurable quality assurance program based on NARA regulations contained in 36 CFR Part 1230, and widely recognized national and international standards. We have agreed to reappraise the digital image files maintained on magnetic tape following the successful completion of the COM conversion project, and to assist the Census Bureau in developing an SF 115 which will include both the digital image files and the COM records. This SF 115 will be circulated to all NARA units, and we will publish a notice of the availability of the schedule in the Federal Register in accordance with our standard procedures. In addition, we will directly solicit comments on the appraisal of this schedule from a wide variety of professional groups and organizations which

represent significant users of records in NARA.

The Assembly has expressed concerns about the quantity of blank pages in the digital image files. NARA staff has carefully examined this issue, and we have determined that it is not possible to delete or otherwise remove blank pages from individual census forms due to the method used to scan the forms in the Data Capture Centers. The image files are “double-page images” and not arranged in sequential page order. For example, on the Short Form, the front side of the form comprises one image, and the back side of the form comprises the second image. To retrieve personal information from the Short Form for any household with two or more residents, access to both images is required as Person 1 is listed on the front side (the first image), and Persons 2 through 6 are listed on the back side (the second image). Each Long Form consists of a total of 20 double-page images with pages 1 and 40 comprising one image, pages 2 and 39 comprising the second image, and pages 3 and 38 comprising the third image, and so forth. For the Long Form, access to all 20 images of the form is required if the household has three or more residents (i.e., the responses for Persons 1 through 3 require 21 pages, necessitating access to all 20 double-page images). Since the average size of the American household is 2.62 persons, the majority of image files of the Short Form will contain responses for households that will require access to both. Similarly, for the Long Form, access to all 20 images is required for households of three or more residents. Based on our review of Census 2000 digital image files maintained by the Census Bureau in Bowie, MD, we concluded that to avoid the introduction of a high error rate in accurately identifying all of the possible variants of “blank” pages, the most prudent course of action is to convert all Census 2000 image files to computer output microfilm (COM).

We have taken the necessary steps to be certain that the COM images can be indexed and retrieved by researchers using information in the Individual Census Record File (ICRF). The ICRF is the master file for all household responses regardless of how the information was gathered by the Census Bureau. The ICRF includes the names of all household residents and all associated address and geographic information for each housing unit or person living in a group quarters location. The ICRF was appraised as permanently valuable in record schedule N1-29-00-01, approved on March 6, 2000.

We appreciate the Assembly’s interest in the disposition of these very important records. At this time, it appears that the Census Bureau will begin the COM conversion project on or about November 1, 2000. If you have any questions, please do not hesitate to contact me on (301) 713-6410.

Sincerely,

JOHN W. CARLIN
Archivist of the United States

SAA Government Records Section Steering Committee
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Comments and questions regarding this web site can be directed to [Janet Waters](#)

