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Records Management in the National Park Service

In March of 1997, a small reorganization in the NPS Washington administrative office brought the records management job to my office, a new entity called the Washington Administrative Program Center. When we began digging into our new area, what we found was not so much a functioning program, but fragments of a program, a program at its nadir. **The status of records management in the National Park Service at the end of the 20th century is that of a program that must be rebuilt nearly from the ground up, at the same time that it begins to tackle the immense challenge of electronic recordkeeping in a souped-up cyber world.**

Since the 1980s the National Park Service has struggled with flat budgets matched by expanding responsibilities, the downsizing of government in general, and fast fires (both real and figurative) that keep the staff busy. Not unexpectedly, the quiet activity of recordkeeping, whose customers are future managers and researchers, has not fared well. Recordkeeping practices in the National Park Service can be sublime (a professional archives at Yellowstone, officially affiliated with the National Archives, and with a master inventory of records available on the Web), but in most locations are marginal—subject files at desks, boxes in storerooms and attics, and no one around who knows what to do with it all. Particularly since 1994, as NPS has undergone a top-to-bottom reorganization under specific direction to downsize central offices, recordkeeping activities in headquarters and regions have been neglected out of necessity—no one to do them, too much other pressing business. In many places, records management has now been neglected so long that awareness of its basic elements—say, what a file code is, and why it is put on correspondence—has been lost. Staff motivated to tackle their records don't have much help, either—NPS-19, the internal guidance to NPS staff on records management, is bureaucratic and unhelpful, with a complex and outdated records disposition schedule. Records management has a clerical "central files" image, not intellectually connected with the information age or the NPS mission.

But as we have taken stock of records management over the last year, we have found good news as well. The Service has a long-term mission to preserve cultural and natural resources "unimpaired for future generations"—this creates a market and a direct mission-related need for records management for many types of park records. As an agency that has responsibility for cultural resources, the National Park Service has a small but vigorous community of historians, archivists, and curators. These professionals understand and strongly support the need for records management, and form a core group with expertise in many aspects of hands-on records management. The natural resources community of scientists also understands the need for long-term data retention and access. Around the Service, a handful of excellent records management and archival projects were ongoing in a few locations (see articles by Mary Jo Pugh and Susan Kraft elsewhere in this issue). The HABS/HAER program (Historic American Buildings Survey/Historic American Engineering Record), has its own records group number and functions as an affiliated archive (see article by Jerry Wallace in the upcoming archival issue of *CRM*). And the National Archives strongly supports our renewed efforts to revive the records management program.

Where to start? **We decided to start at the beginning, by rewriting entirely our guidance and records disposition schedule,** the old NPS-19, and work groups began work last summer. It was immediately clear that a new, "customer friendly" approach was needed to make records management simple, understandable, and worthwhile to people. Dry recitations of regulation and law are not enough; with many other jobs competing for precious staff time, records management, in essence must be "sold" to its customers as a responsibility worth their time and effort. Furthermore, with staff reductions, the day of the trained records manager, with few or no responsibilities other than records and files, has gone. Records management on the ground is going to be largely done as a collateral duty. The work groups began working on reducing and simplifying the immense and complex file codes and files disposition schedule, reformatting it into a new, user-friendly "plain English" (question and answer) format, and simplifying files disposition instructions.

It has also become clear we need to develop recordkeeping techniques and strategies that fit

NPS culture and the realities of park operations. One of the problems with "selling" proper records management in the NPS has always been that, in the end game, records were moved completely out of NPS control, and greatly reduced accessibility for NPS staff, while the long-term resource management mission of NPS requires that some records be kept and used almost indefinitely. The National Park Service has for many years been at loggerheads with the National Archives and Records Administration (NARA), the agency with the lead in managing records in the federal government, with the root of the dispute lying in a clash between the mission of these two agencies. In meeting its core mission of managing and preserving natural and cultural resources "unimpaired" for the next generation, NPS staff use many permanently valuable records on a daily basis. For example, the records of the National Register of Historic Places, dating back to 1966, are referenced daily by NPS staff. Collections of original photographs at the NPS Harpers Ferry Center—some from the WPA era, some by Ansel Adams—are used to prepare exhibits and park brochures. Yet federal records law requires that permanent records be physically and legally turned over to the National Archives after 30 years—and caring for those records is one of their core missions. **Two agencies, each with proud, long-term missions that dedicated staff were bent on fulfilling, found it difficult to come to a consensus on what to do.**

The fact that records law requires moving records out of the NPS and to another agency clashed with other parts of the NPS organizational ethic as well. The NPS is very proud of its own history and traditions, and this makes it difficult to go through a process which results in records being removed from direct NPS care and access. The geographic dispersion and isolation of parks also conflicts with standard NARA processes. For remote parks, moving your records to a records center or archives hundreds of miles distant may make them more accessible to the public, but makes doing

The National Park Service Records Management Handbook Taskforce shown at their August 11-15 meeting at the Huff House in Roscoe, New York. Individuals included are: standing, left to right: Jerry Wallace of the National Archives, Carla Hahn, Phyllis Hahn, Elinor Aye of NARA, Debra Melton, and Mona Hutchinson; sitting left to right, Diane Vogt-O'Connor, NPS Records Manager Betsy Chittenden, Mary Beneterou, and Pinky Salley.

your job as a ranger or superintendent more difficult. "Have the boxes sent back from the records center" is a degree easier in Washington DC, or Philadelphia, than in parks where a trip to the grocery store is an all-day excursion.

Clearly, for records management to ever be practiced on a wide scale in the National Park Service again, it is essential to develop alternatives to the traditional records-keeping paths that fit the NPS circumstance. Several NARA employees joined both our work groups and we began to explore options. **We found common ground by returning to the basics of NARA's mission in preserving permanent records: that they be well-cared for, and accessible to the public.** A number of options are now being explored that may allow NPS to keep more of its records close to home, if the National Park Service commits to caring for these records using archival standards, and to make them more accessible to outside researchers. For example, the NPS-19 work group is looking at creating a new NPS records category of "permanent active," to be applied to records that are permanent, but because they are in active use by the NPS, would remain in the custody of the NPS and not be transferred to NARA until they become inactive. For these permanent active records, the NPS would set standards for their care and public access that satisfy the intent of records management law and management accountability, and NPS managers would be required to make a commitment to meet those standards as a condition of maintaining records locally. Another alternative might be the development of in-house records expertise at NPS locations that could provide professional records services to small or isolated NPS parks without resources or facilities to care for their records on-site.

Records management is also on the difficult cusp between paper and electronic, a transition all enterprises are struggling with. What does it mean to the National Park Service—to any organization—to shift a large portion of its communications from letter and phone to email? Or to have a whole new medium of communication with the public open up on the Internet? The ubiquity of electronic documents, email, and the Web have thrown records management its greatest challenge since mankind stopped using clay tablets and had to learn how to preserve paper. **The electronic media evolve so quickly that the question is not what are archivally stable storage media, but what format can information be put into so that it can be read on available hardware and software 10 or 20 years from now.**

Email—which the courts ruled several years ago does constitute records—is exchanged in volumes that are exponentially greater than paper

communications. With 10,000 mailboxes, the National Park Service is conservatively estimated to generate 10-20 million messages each year. All of them are not records—but legally, all of them need to be evaluated as to whether or not they are records. It's impractical to have anyone but the originators of those 20 million messages make the determination as to whether each message is a record—how will we teach all those employees to do that? And how are the thousands of records then indexed and stored? Guidance NARA issued in 1995 provided that email deemed to meet the definition of a record could be printed out and filed in paper recordkeeping systems. This was a clumsy solution, but at least marginally workable. There was no real alternative—satisfactory electronic recordkeeping software was not on the market and no federal agencies were in a position to handle filing email electronically. But in 1997, a Federal judge in another case ruled that this was not acceptable, that in fact, records created electronically must be stored electronically. "Simply put" the court held, "electronic communications are rarely identical to their paper counterparts; they are records unique and distinct from printed versions of the same record."[1] **We are now forced to face the reality of electronic recordkeeping for electronic records.**

At 75 million visits per year, the National Park Service's "ParkNet" Web site is now visited by more people than any single park in the system, and is rapidly approaching the 270 million visits annually to all parks combined. ParkNet <www.nps.gov> contains hundreds of individual pages about parks and National Park Service activities, from virtual tours to press releases to draft park planning documents out for public comment. Clearly ParkNet needs to be preserved as a record of what the National Park Service says and does. But ParkNet changes daily, as various programs, parks, and offices post and remove information. How can this be preserved? How often must a Web snapshot be taken? And again, how can something so technically complex, with videos, sound, and links to other sites, be archived in a way that it can be read and experienced in 20 years—or even 5?

To these questions there are no easy answers—no real answers at all as yet. **The National Archives and the Department of Defense are developing functional requirements for the first generation of true electronic recordkeeping systems, and the first commercial products are now coming on to market.** But these are add-on products, and the true solutions—recordkeeping and archiving built in to your email software, for example—seem far off. The U.S. Patent and Trade Office, which has serious recordkeeping responsibilities, wrote Microsoft directly to ask if they would work on electronic recordkeeping software—and were told no. The Web question bumps technical complexity up another degree of difficulty.

Yet the Web, and a new law, the Electronic Freedom of Information Act (E-FOIA) of 1996, also begin to suggest a path to solving two chronic recordkeeping problems—those of access, and resources. **The E-FOIA requires that certain types of agency documents, such as policy and guidance, all commonly used documents of interest to the public, be made available in "electronic reading rooms"—the Web.** The intent is for the federal government to become proactive, rather than reactive, in making available to the public the records that it is most interested in using. A permanent record posted on the Web is a record that is far more accessible than any paper document ever could be, and to some extent obviates the need for moving records to central archive locations. The new E-FOIA requirement is also focusing new attention—and possibly new funds—on records management, especially electronic records management. The administration's FY99 budget request now in Congress includes $1 million in permanent base funding for implementing E-FOIA in the NPS. If this request survives, it would go a long way toward assisting hundreds of NPS locations to make thousands of valuable records available electronically, and provide base money to start tackling the permanent electronic storage that the law now requires.

Records management in the National Park Service has a long way to go. The new user friendly NPS-19 and records disposition schedule aren't written yet, much remains to be worked out with the National Archives, the folk knowledge of recordkeeping requirements is still slipping away, and the E-FOIA money isn't here. But the extraordinary mission of the National Park Service, to preserve resources "unimpaired for future generations," means that records management only needs some creative thinking, some well-crafted solutions, and some culturally-sensitive marketing to bring it alive again. And the promise of the information age, which will let us bring extraordinary photographs and important park management plans to audiences that could never have seen them five years ago, makes it a wonderful time to be in the records business.

Note

[1] *Public Citizen, Inc., et al., v. John Carlin, Archivist of the United States*, U.S. District Court, 1997 (Civil Action 96-2840(PLF))

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