In this article, the author will discuss the appraisal and custody of electronic records based on an investigation of the appraisal policies, disposition instructions, and other records management guidelines of four national archives. Common appraisal methodologies of four national archives are largely media neutral, although some appraisal strategies and criteria are more relevant for electronic records. The traditional custody model still dominates electronic records, although the post-custody model is used in special circumstances. A variant of the post-custody model, the transfer of the physical custody of electronic records to a third-party trusted repository, is also identified.

Introduction

How to appraise electronic records and who should take custody of them have been debated in the archival profession for over 10 years. In the year 2000, after a comprehensive literature review, the Appraisal Task Force of InterPARES I reported some consensus about the appraisal of electronic records: “Electronic records must be appraised from the same theoretical and methodological standpoint as traditional records.” Two years later, Luciana Duranti, the leader of the InterPARES project, argued that although the values and criteria of appraisal remain the same for electronic records, the methodological changes are quite radical. She identified four fundamental changes in the appraisal of electronic records:

… first, the appraiser must assess the authenticity of the records considered of continuing value; second, the appraiser must determine the feasibility of the preservation of the authenticity of the records; third, the appraisal decision must be made very early in the life of the records; and, fourth, the appraiser must constantly monitor the records of the creator and… revise the appraisal decision.
The issue of using a custody model versus a post-custody model for the permanent preservation of electronic records has been debated. According to Philip Bantin, the traditional custody model insists that archival repositories take on custody of electronic records, whereas the post-custody model argues that “the transfer of the inactive records to an archives may be delayed or deferred for much longer periods than in the past; in some cases, the records may actually remain indefinitely in the custody of the originating office.” This article discusses the appraisal and custody of electronic records based on evidence gathered from an investigation of the appraisal policies, disposition instructions, and other records management guidelines of four national archives, including the National Archives and Records Administration (NARA) of the United States, Library and Archives Canada (LAC), the National Archives of Australia (NAA), and the National Archives of the United Kingdom (NA). National archives were chosen because, unlike many smaller archival repositories, they have extensive experience with electronic records, and their appraisal and custody practices are well documented.

Research Methods

From August to November 2011, the author explored the Web sites of four national archives to research the appraisal policies, records disposition guidelines, and other documents that guide records management for government agencies. The appraisal policies and disposition guidelines were carefully analyzed and information about the appraisal and custody of electronic records was extracted. Although these documents do not reveal actual practices, they do provide guidelines. Based on the information gathered from these documents, this article discusses the appraisal and custody of electronic records.

Findings

First, this article will analyze the common appraisal methodologies applied by four national archives and will discuss how these methodologies apply to electronic records. It will then discuss four fundamental changes proposed by Luciana Duranti regarding electronic records, based on findings from the national archives. Lastly, it will discuss issues regarding the custody of electronic records.

Common Appraisal Methodologies Applied by the Four National Archives

The four national archives examined here use different terms to describe their appraisal methods and emphasize different aspects in appraisal; however, detailed analysis shows much consistency in appraisal methods. All essentially use a
combination of macro and micro appraisal methods and evaluate both the evidential and informational values of records.

**Macro and Micro Appraisal**

The appraisal policy of Library and Archives Canada clearly states that it uses a structured appraisal model that starts with macro-appraisal, followed by micro-appraisal. Macro-appraisal assesses the context of records creation instead of records themselves. The context includes the legal context, functional context, structural context, records systems processes, and technological context. As stated in LAC’s appraisal policy, macro-appraisal of an institution requires an assessment of “legislation, mandates, and policies relevant to the institution as a whole” and “administrative structures, macro-functions, functions, sub-functions, programs, activities, transactions, and client interactions, as well as records-creating processes, records systems, and recording technologies.” Macro-appraisal at LAC moves top-down from the “function of the records creator, through various administrative structures and business processes designed to implement that function (and numerous sub-functions), to information systems created to produce and organize records that permit those processes to work, and finally to the records which document all the foregoing.” When the macro-appraisal is completed, the archivist forms a set of hypotheses regarding the importance of functions and activities of records, and tests these hypotheses by examining actual records in different categories. The appraisal of actual records is called “micro-appraisal.”

The appraisal policy of the National Archives of Australia indicates it uses a top-down functional analysis approach for appraisal. Detailed instructions for conducting such a top-down functional analysis are provided in the first three steps in the Designing and Implementing Record Keeping Systems (DIRKS) manual. The three steps are preliminary investigation (of the role, structure and business of the organization, the regulatory and sociopolitical environments in which the organization operates, and major factors affecting its record-keeping practices); analysis of business activity; and identification of record-keeping requirements. This is similar to the context analysis described in LAC’s macro-appraisal, and is much broader than a purely functional analysis. In other words, the functional analysis of the NAA is in fact a macro-appraisal approach. The term “micro-appraisal” does not appear in NAA’s appraisal policy, but many of the appraisal criteria and objectives entail analyzing the content of records. This is essentially a micro-appraisal approach. In its instructions for developing a records disposal authority, the NAA, after formulating disposal classes based on functional analysis, suggests checking existing records to verify the disposal classes on the records disposal authority proposal. This is similar to the hypotheses testing process at LAC. This illustrates that the NAA also uses an appraisal model that starts with a macro-appraisal, followed by a micro-appraisal, although its policies do not state this explicitly.

In NARA’s guidance for the disposition of federal records, the first step is to review the functions of federal records and record-keeping requirements and practices. This includes “examining pertinent documents, such as laws, regulations, organization charts, and functional statements, and consulting with program managers, [automated data processing] managers, and records personnel.” This is equivalent to the context
analysis stage in the macro-appraisal approach created by Library and Archives Canada and the first three steps in the DIRKS manual used by the National Archives of Australia. Further evidence of NARA’s use of context analysis in the appraisal process can be seen in the Benchmarking Report on Business Process Analysis published by NARA in 2005. The report recommended that NARA and federal agencies train records managers to use business process analysis as a way to determine record-keeping requirements. 

NARA’s appraisal policy does not say whether it uses a macro or micro-appraisal approach in this process, but some of its appraisal criteria are associated with such approaches. For example, the appraisal questions “Is the information unique?”, “What is the volume of records?”, and “How usable are the records?” require a micro-appraisal approach to provide answers. The appraisal question “How significant is the source and context of the records?” requires a macro-approach to answer. In talking about the appraisal of research and development records, NARA guidelines state “appraisal of the records requires an understanding of the entire [research and development] business process, including the project/product lifecycle and use of outside entities for review or support.” This is also a macro-appraisal approach.

The National Archives of the United Kingdom traditionally appraises the provenance (functional and structural context) when selecting archival records. This is an essentially macro-appraisal approach, and the NA states that it is currently moving to using macro-appraisal. It defines “macro-appraisal” as the assessment of “the value of records at a government, departmental or unit level rather than at an individual document or file level.” This definition says that macro-appraisal assesses the organizational structure, whereas micro-appraisal assesses at the individual document or file level. This is not identical to “macro-appraisal” as defined by the LAC. In LAC’s definition, macro-appraisal assesses records creation context; micro-appraisal appraises records, either at the series level or lower. Although NA’s definition of macro-appraisal deviates from that provided by LAC, NA’s other descriptions of macro-appraisal do include functional analysis and thus show consistency with macro-appraisal as defined by LAC. For example, NA’s appraisal policy also states “macro-appraisal encourages government-wide or organization-wide analysis of functions as a guide to identifying records of value for business and archival purposes.” In its guidelines for deciding what records to keep, the NA states that “the decision for what records to keep requires an understanding of the organization’s purpose and functions, how it carries out those functions, and how it uses the records it holds already.” The NA guidelines also state that the difference between the newly adopted macro-appraisal policy and the traditional provenance-based appraisal policy is that macro-appraisal attempts to “make an understanding of the functions which produced public records an overt, preliminary stage in appraisal work.”

Like the National Archives of Australia and Library and Archives Canada, the National Archives of the United Kingdom also includes a micro-appraisal phase to test hypotheses formulated in the macro-appraisal stage. In its instructions for how to compile an appraisal report, NA guidelines formulate broad categories of records for disposition based on macro-appraisal, and state:

The process of turning the broad decisions in the Report into specific selections involves a look at the actual content of the records and this might
necessitate changes to the appraisal decisions. For example, committee papers might prove to be anodyne and the material better collected elsewhere; or case files prove to be more routine and less informative than anticipated and the decision is made to select a database instead.\textsuperscript{17}

**Evidential and Informational Values**

The National Archives of the United Kingdom explicitly endorses T. R. Schellenberg’s appraisal model.\textsuperscript{18} Since 1958, the NA has been using the Grigg system for appraisal. The Grigg system involves two reviews of records. In both reviews, Schellenberg’s appraisal theory is applied. The first review appraises primary value, and the second appraises secondary values, including evidential value and informational value. The NA points out that functional appraisal focuses on evidential value and downplays the information value in selecting records. Therefore, although it will adopt a macro-appraisal approach that focuses on functional analysis, it continues to use Schellenberg’s appraisal model to assess both the evidential and the informational value of records.\textsuperscript{19}

Library and Archives Canada and the National Archives of Australia do not explicitly endorse Schellenberg’s appraisal model. Nevertheless, their appraisal policies contain an assessment of evidential and informational values that is consistent with Schellenberg’s appraisal model. In addition to assessing the evidential value of records using the macro-appraisal and functional analysis approach, LAC also selects records of “national significance which contain significant or unique information that will substantially enrich understanding about Canada’s history, society, culture and people.”\textsuperscript{20} This is informational value as defined by Schellenberg. The NAA defines five appraisal objectives. The first two are related to evidential values and the other three are related to information values. For example, the second objective is “to preserve evidence of the source of authority, foundation and machinery of the Commonwealth and Commonwealth institutions.”\textsuperscript{21} The third objective is “to preserve records containing information that is considered essential for the protection and future well-being of Australians and their environment.”\textsuperscript{22}

Although Schellenberg’s appraisal theory originated at NARA, NARA’s current appraisal policy does not mention Schellenberg’s appraisal model. Yet evidential and informational values are mentioned repeatedly in NARA’s appraisal policy. Section six of the appraisal policy, “Strategic Framework,” lists three kinds of records that are evidential records. In section seven, which lists permanent records categories, the first two categories are evidential records that document the rights of citizens and the actions of federal officials. The third category is records that provide information “about people, places, material objects, and scientific phenomena, as well as about social conditions, political and economic activities, and events in the United States and other countries.”\textsuperscript{23} In section eight, “Appraisal Objectives,” the first seven objectives are intended to preserve various kinds of evidence. The eighth objective is to preserve records that “contribute substantially to knowledge and understanding of the people and communities of our nation.”\textsuperscript{24} This is consistent with the informational value as defined by Schellenberg.
How Do the Common Appraisal Methodologies Apply to Electronic Records?

As mentioned earlier, macro-appraisal assesses the records creation context instead of records themselves; therefore, it can be applied to all kind of records. This has also been noted by Terry Cook, the major architect of macro-appraisal theory. Evidential values can either be assessed based on a structural and functional analysis of the records creation context, or based on records content. For example, a functional analysis can be used to select records that provide evidence about how government organizations function. Records documenting citizen rights, such as military service records and birth certificates, can be decided based on the records’ content. In either case, the appraisal of evidential value is media neutral. The informational value of records is the value of the information in them, so it is based on records content and is independent of records media. Micro-appraisal is the appraisal of records, including their content, format, and media. When micro-appraisal is conducted solely based on evaluating the information values of records, there is no difference between traditional and electronic records. Differences between the micro-appraisal of traditional and electronic records occur only when electronic records’ unique characteristics, e.g. fragility, manipulability, and shorter life span of storage media, are a concern. To sum up, all these common appraisal theories and methodologies apply to both traditional and electronic records, although there may be differences between the micro-appraisal of traditional and electronic records.

The Four Fundamental Changes

As mentioned earlier, Luciana Duranti noted four fundamental methodological changes inherent in the appraisal of electronic records. Two of the changes—appraising authenticity and preservation feasibility—fall into the micro-appraisal domain. The other two—early appraisal and monitoring appraisal decisions—are about the timing and procedures of appraisal. This section will analyze how the appraisal policies of the four national archives reflect these four fundamental changes.

Early Appraisal

Earlier appraisal for electronic records does exist at the four national archives. The appraisal policies of the National Archives of Australia, Library and Archives Canada and NARA treat paper and electronic records in an integrated manner. They do not mention that they appraise electronic records earlier than traditional records. This does not preclude the possibility that they appraise both traditional and electronic records earlier than they would have in the past. The National Archives of the United Kingdom applies different appraisal timing and procedures for paper and electronic records. As previously noted, archival appraisal at NA has been based on the Grigg’s system where records are appraised twice: first, at five years from closure, and second, at 25 years from creation. In the future, NA will maintain this timing for paper records, but will also allow for earlier second reviews. For electronic records and hybrid records
that include both paper and electronic records, NA will merge the two reviews and conduct appraisal before creation through file plans, or at creation by filing records into folders with disposal already determined. With the rapid increase in digital records, the merged review and early appraisal mode is likely to dominate in the future.

Early appraisal of electronic records is not unique. In the four countries examined here, the national archives and government agencies collaboratively develop records disposal authorities/schedules that enable early appraisal. For many records series, the disposal authorities apply to both existing records and records to be created in the future in the same series. Therefore, disposition has been decided before creation. In situations where the appraisal is also used to assess the need for records, the existence of the records and their documentary forms are decided before their creation. As stated by NAA:

\[\ldots\text{You are appraising the need for records related to the functions and activities of your organization, not just the particular records that have been created in the past to support that work. Remember that the disposal authority, in most cases, will be used to sentence records created in the future as well as those that have already been created. While it is important to have an authority that is useable for existing records, do not make the classes so narrow that they cannot be used for the range of records which may be created in the future.}\]

The records disposal authorities of the four national archives largely organize records based on functions, organization structures, subjects, topic, and cases. LAC uses function-based records classification for their records schedules. NA and NAA use function-based classification at the higher levels, and then use subject-based classification on the lower levels. At NARA, record schedules are usually based on function, organization, or a combination of the two. Recently, NARA published guidance about big bucket schedules, which means “the unit to be scheduled would not necessarily be the records series, but all records relating to a work process, group of work processes, or a broad program area to which the same minimum length of retention would be applied.” This is a function-based classification scheme that contains only large categories. All of these classification criteria are media neutral and therefore the records disposal authorities are usually media neutral. Hence, both traditional and electronic records can be appraised early in records life through records schedules/disposal authorities.

**Authenticity**

NARA, the National Archives of Australia, and Library and Archives Canada mention the importance of authenticity in appraisal. The NAA includes authenticity as one of the major criteria in appraisal. Its definition of authenticity is consistent with InterPARES’ definition which states that authenticity is “whether records are what they purport to be.” The NAA also includes integrity and completeness as other appraisal criteria. It defines integrity and completeness as “whether records have been securely maintained to prevent deliberate or accidental unauthorized access, alteration or removal, and whether they have context and structure as well as content.” This is consistent with the InterPARES benchmark requirements for authenticity. LAC
includes authenticity as one of its micro-appraisal criteria. It describes authenticity as the following:

The records must have been created in the normal course of business under established procedures, and clearly linked by provenance to their creator and originating or successor record-keeping system. There must be assurance the records are genuine, and unaltered, or that any alterations have left a clear audit trail.35

This definition of “authenticity” is broader than that of InterPARES, and it includes both the concepts of authenticity and reliability as defined by InterPARES.36 Although the two national archives interpret authenticity slightly differently, their respective definitions are media neutral. NARA does not include authenticity as an appraisal criterion in the main text of its Appraisal Policy and its General Appraisal Guidelines, but it does include authenticity as a concern in the appraisal of observational data, which usually has been collected in a digital format.37 This is a sign of a special concern for electronic records’ authenticity.

Preservation Feasibility

All of the four national archives include preservation feasibility in their appraisal policies, although only National Archives of Australia explicitly used the term “feasibility.” Some feasibility issues concern paper records, whereas others address both paper and electronic records. For example, National Archives of the United Kingdom mentioned the storage cost of paper records and the costs of preserving the continuing readability and authenticity of electronic records.38 Library and Archives Canada and NARA both discuss preservation feasibility issues caused by the poor physical condition of records, which relate to all media. LAC does not accept encrypted electronic records, or records made unintelligible by the presence of a digital signature due to preservation feasibility concerns.39 NARA policy discusses the “availability of appropriate technology to enable access” for observational data, and the technical challenges of recovering digital information.40 The NAA indicates it may destroy records with serious technical defects and give preservation priority to records that are technically sound.41 These are feasibility concerns caused by the technical features of electronic records.

Monitoring Records and Updating Appraisal Decisions

The four national archives discuss two kinds of rationales for monitoring and updating disposition decisions as necessary. The first type of rationale applies to records in all media, as it is about changes in legislation or policy, business needs, organizational structure, functional structure, or other records creating and using environments. Most of the reasons for updating disposition schedules noted by NARA and the NA fall into this category.42 The second type of rationale is unique to electronic records, as it is caused by technological obsolescence and media decay. This second kind of monitoring includes testing readability, watching technological development, and refreshing and migrating electronic records. As stated by the NAA, “Agencies that need to retain digital records for the long term should plan for technological obsolescence
by ensuring that records can be copied, reformatted, converted or migrated across successive generations of computer technology.”

The above analyses have shown that none of the “fundamental changes” are unique to electronic records. Early appraisal is conducted for all kinds of records through records schedules. Appraisal decisions need to be monitored and updated not only because of technological concerns for electronic records, but also because of changes in the records creation context, which affect records in all media. Preservation feasibility and authenticity are concerns for both traditional and electronic records.

Although not entirely unique to electronic records, the four fundamental changes may be especially relevant to electronic records. The unique characteristics of electronic records create more challenges for appraisal than they do for traditional records, and they have made early appraisal, monitoring appraisal decisions, and the appraisal of authenticity and preservation feasibility more urgent and important. What should be emphasized in statements about the four fundamental changes is the word “must.” For example, although both traditional records and electronic records can be appraised early, electronic records “must” be appraised early because of technological obsolescence. Although changes in the records creation context cause the appraisal decision for both electronic and traditional records to be monitored and updated, the technological obsolescence issue creates an additional push for the monitoring and updating of appraisal decisions for electronic records. Although media decay is also a concern for paper records, the shorter life span of digital storage media makes assessing preservation feasibility particularly urgent.

This study identified another appraisal concern that is not unique but is relevant for electronic records. It is the usability of electronic records. Usability is included as one of the major criteria in the appraisal policies of the NAA, NARA, and LAC. NARA assesses the usability of records with regard to three aspects: the way records were gathered, organized, presented, or used in the course of business; the technical considerations affecting the records’ usability; and the effect of the records’ physical condition on their usability. LAC describes “usability” as ensuring that records are “legible, coherent, accompanied by relevant supporting documentation (or meta-data), and arranged or indexed in a manner rendering them usable by researchers, or have the potential to be made so.” LAC also includes manipulability as one micro-appraisal criterion specifically for electronic records, which can be considered one aspect of usability.

As noted earlier, the macro appraisal and Schellenberg’s appraisal models apply to electronic records. In addition, two micro-appraisal criteria used in appraising traditional records (authenticity and preservation feasibility) are applied to electronic records, and like traditional records, the appraisal decisions for electronic records need to be monitored and updated if necessary. In addition to these high-level appraisal theories, methodologies, and criteria, some lower level methods for implementing certain appraisal theories or criteria also remain valid for electronic records. For example, when appraising the authenticity of traditional records, archivists rely on confirming the existence of an unbroken chain of custody, knowledge of recordkeeping practices, and comparing records with known authentic copies. All of these methods, although not always sufficient, are still useful for assessing the authenticity of electronic records.
But the unique characteristics of electronic records also require new appraisal methods. For example, archivists use hash values to verify the authenticity of electronic records, and they assess the suitability of file formats for long-term preservation of electronic records. These methods do not exist in the appraisal of traditional records. So, on the one hand, many appraisal theories and methodologies for traditional records still apply to electronic records, and these traditional methodologies can be inherited, adapted, and applied to electronic records. But, on the other hand, new appraisal methods need to be created to deal with the unique characteristics of electronic records.

**Custody of Electronic Records**

The traditional custody model dominates the preservation of electronic records. The four national archives not only accept and preserve electronic records, but they also accession electronic records earlier than paper records, if not at the same time. The National Archives of Australia used a post-custody approach in the 1990s in which “digital records of archival value remained in agency custody except in special circumstances.” Since March 2000, it has moved to take custody of all archival digital records. Both paper and electronic records that have archival value must be transferred into the custody of the NAA as soon as they are no longer required for immediate business purposes. The National Archives of the United Kingdom continues to be the final resting place for most archives, including electronic records whose “transfer timings will in general be shortened.” Library and Archives Canada normally acquires an archival copy or version of electronic records as soon as archival value has been established, and before operational use of the record has expired. NARA offers government agencies several options in terms of timing of the transfer of electronic records. Government agencies can choose to transfer paper and electronic records at the same time, as long as they can maintain the records until transfer. They can choose to transfer electronic records to NARA earlier than paper records. They can also choose to transfer electronic records to NARA earlier as a pre-accession, which entails transferring physical custody first within two to three years and transferring legal custody later.

The post-custody model is implemented in special circumstances. The NAA, NARA, and LAC all mention circumstances in which creating agencies should retain archival digital records rather than transfer them to the archives. NARA maintains that research and developmental records with long-term value are most appropriately maintained by the creating agencies because these agencies usually possess the scientific expertise essential for providing effective access to the data. The NAA believes that the “best prospect for preserving access to some digital records is to retain them within their original technological environment.” LAC lists some situations where records should stay with government agencies. Examples of these special circumstances include a high cost of transfer or other technical considerations (such as software copyright, data complexity, and software and hardware dependency); whether the creating institution has a continuing and long-term operational need for the record; whether reference services for that kind of record can best be provided by the creating institution; or
whether statutory provisions prevent transfer to LAC. Electronic records that are difficult to preserve are one of the reasons for a delayed transfer or no transfer at all to the LAC. In these cases, the creating agencies retain physical custody of the records, but legal custody of the records is transferred to the national archives. As the NAA states, “Digital records of archival value to be retained in the physical possession of agencies remain subject to the Archives Act 1983. The National Archives will still be responsible for registering and describing the records in its control systems.”

A variant custody model was also identified. In this model, national archives have legal custody and intellectual control of the archival records, but the physical custody is transferred to a trusted repository that has the specialty to manage specific kinds of records. This variant model has been used for both electronic records and audiovisual records. NARA allows archival observational data in the physical sciences to be maintained by a scientific data center that possesses the necessary expertise to ensure preservation and access. In the UK, many electronic datasets selected for permanent preservation are transferred to the UK Data Archive and the National Digital Archive of Datasets. Films selected with archival value go to the Imperial War Museum or the National Film and Television Archive. Sound recordings selected for permanent preservation are transferred to the British Library’s National Sound Archive. This indicates that even national archives that are relatively strong in resources and expertise need trusted third-party repositories to preserve certain electronic records. Small repositories are likely to be in greater need of this preservation model. With the growing increase in the varieties of electronic records, the trusted repository model is likely to grow in the future. As is widely known, in 2002, OCLC and RLG defined the attributes and responsibilities of trusted repositories. In 2007, the Center for Research Libraries and OCLC published the criteria and checklist for the certification of trusted repositories.

**Conclusion**

Many of the theories and methodologies for the appraisal of traditional records still apply to electronic records. Yet the unique characteristics of electronic records require new appraisal methods and make some appraisal methods—such as early appraisal, appraisal of preservation feasibility and authenticity, and updating appraisal decisions—more relevant or urgent. The traditional custody model continues to dominate the preservation of electronic records, and post-custody exists only in special circumstances. In addition to the traditional custody model and post-custody model, the physical custody of some electronic records is taken on by third-party trusted repositories rather than records producers or archival institutions that have the legal custody of the records.
**ABOUT THE AUTHOR:** Jinfang Niu is an assistant professor at the School of Information, University of South Florida. She received her Ph.D. from the University of Michigan, Ann Arbor. Prior to that, she worked as a librarian at the Tsinghua University Library, P.R.C., for three years. Her current research focuses on electronic records, digital curation, and information organization.

**NOTES**

7. LAC, “Appraisal Methodology. Part B.”
13. Ibid.
14. Ibid.
16. Ibid.
18. Schellenberg’s appraisal model is a taxonomy of appraisal criteria. It entails assessing the primary and secondary values of records in order to select records with archival value. Primary values are the value of records for the records producers. Secondary values include the informational and evidential values of records for users other than records producers. Evidential values are the evidence that records contain regarding the functions and activities of records producers. Informational values are the information that records contain on persons, corporate bodies, things, problems, conditions, and
the like, with which the records producer deals. Detailed information about this model is available at: http://www.archives.gov/research/alic/reference/archives-resources/appraisal-of-records.html (30 November 2011).


20. LAC, “Appraisal Methodology. Part B.”


22. Ibid.

23. NARA, Strategic Directions: Appraisal Policy.

24. Ibid.


35. LAC, “Appraisal Methodology. Part B.”

36. InterPARES, “Glossary,” 42.

37. NARA, *Strategic Directions*.


40. NARA, *Strategic Directions*.

41. NAA, “Why Records.”


44. NARA, *Strategic Directions*.


46. Ibid.


52. NARA, *Strategic Directions*.
54. LAC, “Leaving Archival Electronic Records.”
55. NAA, “Digital Record-Keeping,” 70.
56. NARA, *Strategic Directions*.