



COUNCIL ON LIBRARY AND INFORMATION RESOURCES  
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26 November 2018

David Ferriero  
Archivist of the United States  
National Archives and Records Administration  
700 Pennsylvania Avenue, NW,  
Washington, DC 20408

cc: [request.schedule@nara.gov](mailto:request.schedule@nara.gov)

Re: Department of the Interior Records Destruction Request #DAA-0048-2015-0003

Dear Archivist Ferriero and NARA colleagues:

I write to share a letter from members of the Advocacy Committee of the Digital Library Federation's interest group on Government Records Transparency and Accountability (GRTA), who are responding to the call for public comment on a Department of the Interior Records Disposition Request.

The DLF community members involved in drafting this letter would like to express their gratitude for the opportunity to offer ideas, not just on request #DAA-0048-2015-0003, but on the larger process surrounding such requests. More context, including links to resources created by GRTA members as they reviewed the proposed crosswalks and overall communications framework (including Federal Register APIs) is available here:

<https://www.diglib.org/dlf-group-looks-at-us-dept-of-interior-records-disposition-request/>

Thank you for your kind attention, and for your hard work and commitment to transparency and good stewardship!

Sincerely,

A handwritten signature in black ink, appearing to read 'Bethany Nowviskie', written in a cursive style.

Bethany Nowviskie, MA Ed., Ph.D.  
Director of the Digital Library Federation,  
Council on Library and Information Resources (CLIR)  
and Research Associate Professor of Digital Humanities, University of Virginia

26 November 2018

Dear NARA colleagues:

The draft Request for Records Disposition Authority (DAA-0048-2015-0003)<sup>1</sup> recently submitted by the Department of Interior (DOI) to the National Archives and Records Administration (NARA) has raised interest and concern within the Government Records Transparency and Accountability Interest Group of the Digital Library Federation (DLF), and in the wider archival and library communities we represent, especially with regard to the processes used to communicate proposed changes to such routine practices.

Records identified for disposal in this Request include important observational data and legal information of public relevance and interest. While it appears that relatively few major changes are being proposed to the current schedules, the complexity of this particular Request and NARA's appraisal of it, along with some of the public commentary it has generated, encouraged our DLF interest group to consider some larger-picture issues it raises, related to our own focus on transparency and accountability in government records—values we know NARA shares.

We are concerned that, as applied in this DOI crosswalk and NARA appraisal, the concept of research value seems substantially limited to exclude scientific, legal, and social research that depend on observational data. Records and information that track changes in the environment and public lands over time are irreplaceable if destroyed, and hold inherent research value. We join other organizations, including Stanford University Libraries<sup>2</sup> and Government Information Watch, in calling for a re-examination of the definition of research value as it applies to records schedules.

As part of a trend discussed by NARA staff in a recent “Records Express” blog post<sup>3</sup>, many federal agencies are transitioning to large aggregation schedules, which enable the use of “big buckets” appraisal criteria.<sup>4</sup> In alignment with this trend, the DOI Request consolidates schedules that were previously more granular. We agree that consistency and clarity help to support transparency; however, the consolidation process raises concerns about the extent to which authority to propose further changes to disposition periods has moved away from the bureaus and offices with expertise on specific sets of records to larger departments and administrations which are headed by political appointees. We hope NARA will take these concerns under consideration as agencies propose to modernize their schedules.

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<sup>1</sup> <https://www.federalregister.gov/documents/2018/09/11/2018-19734/records-schedules-availability-and-request-for-comments#p-26>

<sup>2</sup> <https://freegovinfo.info/wp-content/uploads/2018/11/Letter-NARA-doi-records-destruction-request.pdf>

<sup>3</sup> <https://records-express.blogs.archives.gov/2018/10/26/department-of-interior-updating-their-records-schedule>

<sup>4</sup> <https://www.archives.gov/records-mgmt/initiatives/flexible-scheduling.html>

Finally, under current practices, the only clear way to learn about proposed changes to records schedules is to closely follow the *Federal Register*. Following a notice that a request has been made by an agency and appraised by NARA, an interested member of the public must then request additional documentation. This is a standard procedure that offers some level of transparency. It is admirable that NARA typically responds in the affirmative to these requests, and the extended comment period on this request is greatly appreciated. However, we believe the overall process could benefit from modifications that would improve transparency for the public. We recommend, at minimum, that NARA publish requests for changes on its website, complete with all relevant linked information, in addition to posting notice of their mere existence in the *Federal Register*. As a more developed solution, current records schedules could be published as structured data on the NARA website, alongside a tool that would make any proposed changes to record retention schedules across the federal government easier to find, explore, and understand. Having a centralized location for these requests would not only simplify the process of discovery of federal public records and facilitate commenting in the case of proposed changes to retention schedules, but would also create fewer disjointed, individual requests for this information. We further recommend NARA reevaluate the *Federal Register's* API to improve the ways to programmatically harvest actionable information such as deadline for public comment and agencies impacted by requests.

We appreciate the opportunity to communicate with NARA about this process. We know NARA provides invaluable services to the public and we encourage the dedicated professionals within the Administration to continue to improve these services, including by addressing transparency and accountability issues related to the trend toward moving records disposition authority to higher levels within federal agencies. We further believe that clarified definitions of research value and a centralized database of retention schedules and requests for changes will ensure that NARA's services will be of even higher value to the public.

Thank you for your time and consideration.

Sincerely,

Members of the Advocacy Committee,  
DLF Government Records Transparency and Accountability Interest Group

Margaret Janz, University of Pennsylvania  
Shari Laster, Arizona State University  
Joseph Koivisto, University of Maryland  
James R. Jacobs, Stanford University  
Jeanine Finn, The Claremont Colleges  
Brandon T. Locke, Michigan State University  
Rachel Mattson, University of Minnesota

*Affiliations given for identification purposes only; letter should not be considered the official viewpoint of these institutions.*