

**THE MANAGEMENT AND DISPOSITION OF
PERMANENT AUDIOVISUAL RECORDS
IN THE NATIONAL PARK SERVICE**

**OFFICE OF RECORDS ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION**

TABLE OF CONTENTS

EXECUTIVE SUMMARY

INTRODUCTION

I. AGENCY OVERVIEW.....1

II. AUDIOVISUAL RECORDS MANAGEMENT.....3

III. MUSEUM COLLECTIONS AND FEDERAL RECORDS.....8

IV. MAJOR NPS AUDIOVISUAL COLLECTIONS: CREATION, STORAGE AND DISPOSITION.....12

V. SUMMARY OF RECOMMENDATIONS.....20

APPENDIX A: RECORDS TO BE TRANSFERRED

APPENDIX B: RECORDS TO BE TRACKED

APPENDIX C: NARA AUDIOVISUAL REGULATIONS

APPENDIX D: EVALUATION QUESTIONNAIRE

APPENDIX E: EVALUATION IMPLEMENTATION

APPENDIX F: OFFICES AND SITES VISITED

EXECUTIVE SUMMARY

This evaluation was performed under the authority granted to NARA by 44 U.S.C. 2904 (c) (7) "to conduct inspections or surveys of the records and the records management programs and practices within and between Federal agencies." For this evaluation, audiovisual records were defined as still and motion pictures, video and sound recordings, and posters. The evaluation focused on how these records are created, maintained, preserved, and transferred to the National Archives. In addition, the evaluation report identifies specific series of audiovisual records that are appropriate for transfer to the National Archives, either immediately or at a future date.

The National Park Service (NPS) has a large and diverse collection of audiovisual records. Slides, videos, and motion pictures are used extensively as interpretive and visitor services tools at all sites. Park rangers and other staff use photographs and slides to manage natural resources. All varieties of audiovisual material are included in the many museum collections throughout the Park Service. These audiovisual records are cared for by concerned and competent staff who are usually aware of the usefulness and importance of these records.

At the same time, this evaluation identified a number of problems with the NPS management of audiovisual records. These include limited awareness of the NPS records management program--and hence NARA regulations; poor implementation of the NPS records schedule; inadequate training; and an ineffective program of internal evaluations.

In addition, the agency's strong and active program for the management of its museum collections impacts on the way in which audiovisual records are managed. Significant amounts of Federal records are absorbed into the museum collections with the result that these records are not handled according to records management laws and regulations, but rather according to NPS requirements for museum collections. In particular, preservation and storage standards established by NARA for these records are not followed, and the records are not being transferred to the National Archives as scheduled but are retained by the Park Service at considerable expense.

In order to improve the management of audiovisual records and bring NPS into compliance with NARA regulations, the NPS must:

- develop clear and consolidated recordkeeping requirements for all NPS audiovisual records;
- formally clarify the distinction between audiovisual records and museum objects, and the consequences of this distinction;
- enact measures to ensure that all sites are familiar with NARA regulations and working toward full compliance;
- improve records scheduling and schedule implementation;
- make more effective use of training and evaluation programs.

In addition, NPS needs to identify record material in the museum collections and manage it appropriately; consider transfers to the National Archives from these collections to reduce the administrative burden on the Park Service and to carry out disposition requirements; and hire an archivist in the Curatorial Services Division. NARA also recommends continued cooperation between the two agencies, particularly the sharing of automated collection information, in order to better fulfill the documentation responsibilities of both agencies.

NARA has identified a number of major collections of NPS audiovisual records that should be transferred in whole or in part to the National Archives. In particular, several older series of still pictures in the Bureau of Graphics Research in Springfield should be transferred directly to the National Archives as soon as possible, as should older pre-print motion picture material maintained by contractors.

INTRODUCTION

BACKGROUND AND PURPOSE

During fiscal year 1989 the National Archives and Records Administration (NARA) conducted an evaluation of the management of permanent audiovisual records in five Federal agencies. In addition to the National Park Service (NPS), the agencies evaluated were the Agency for International Development (AID), the U.S. Army Corps of Engineers, the National Aeronautics and Space Administration (NASA), and the Peace Corps. These agencies were selected because of the depth and importance of their audiovisual holdings, and because they represent a range of Federal programs that generate and use audiovisual records.

This evaluation was done under the authority granted to NARA by 44 U.S.C. 2904 (c) (7) "to conduct inspections or surveys of the records and the records management programs and practices within and between Federal agencies." It is the second in a series of NARA evaluations focusing primarily on the management and disposition of permanent records in the Federal government.

For this evaluation, audiovisual records were defined as still and motion pictures, video and sound recordings, and posters. The evaluation focused on how these records are created, maintained, preserved, and transferred to the National Archives. It also involved the identification of specific series of audiovisual records, either to be reviewed for immediate transfer or to be tracked by NARA for transfer at a future date.

Audiovisual records are crucial in documenting agency activities, and their use is becoming more widespread. At the same time they are fragile, and often require special care. NARA has recently published regulations for the management and disposition of these records. This evaluation report provides recommendations to NPS on improving the management, protection, and transfer to the National Archives of its audiovisual records. In conjunction with this and other individual agency reports, NARA is issuing a general report, with recommendations, on the management of permanent audiovisual records in the Federal government.

This evaluation also has been a means for NARA to assess the effectiveness of its regulations, to look at major trends and issues in relation to audiovisual records, and to determine what additional guidance and services NARA may usefully provide to agencies in this area.

AGENCY PROGRAM REQUIREMENTS

According to 44 U.S.C. 3101 and 3102, Federal agencies are required to make and preserve adequate and proper documentation and to establish and maintain an active and continuing records management program. As part of these responsibilities, agencies are required to cooperate with NARA in order to "promote the maintenance and security of records deemed appropriate for preservation [44 U.S.C. 3102 (2)]."

Agency responsibilities for adequacy of documentation and records management must be carried out according to NARA regulations in 36 CFR, Chapter XII, Subchapter B--Records Management. Part 1232 of this subchapter specifically addresses audiovisual records management, and Part 1228.184 contains the requirements for transferring audiovisual records to the National Archives.

After 30 years, the Archivist of the United States is authorized by 44 U.S.C. 2107 to direct and effect the transfer to NARA of permanent records, unless the agency head certifies in writing to the Archivist that the records are needed to conduct the regular current business of the agency.

FORMAT

This report is divided into five parts: Agency Overview, Audiovisual Records Management, Museum Collections and Federal Records, Major NPS Audiovisual Collections, and Summary of Recommendations.

In addition, this report has six appendices. The first lists series of audiovisual records that should be offered for immediate transfer to the National Archives. The second identifies series that will be tracked for transfer at a later date. The third appendix reproduces the NARA regulations governing audiovisual records, and the fourth is the questionnaire used as a guide during the evaluation process. The fifth appendix details agency follow-up procedures to the recommendations in this evaluation report, as specified in 36 CFR 1220.50. The last appendix lists the NPS headquarters offices and field sites visited during this evaluation.

I. AGENCY OVERVIEW

MISSION AND ORGANIZATION

The National Park Service is a component of the U.S. Department of the Interior, functioning under the Assistant Secretary for Fish, Wildlife and Parks. NPS has as its primary mission the administration of designated properties for public education and recreation. These properties consist of more than 350 historic sites; parks and monuments; and scenic parkways, rivers, seashores, lake shores, recreation areas, and reservoirs. Ten regional offices communicate and interpret policy, and provide technical assistance to the sites. In addition, NPS has a number of specialized offices: the Denver Service Center provides architectural, engineering, and related services; the Harpers Ferry Center produces select interpretive exhibits, publications, and audiovisual materials; and the Western Archaeological and Conservation Center provides technical assistance for regional archaeological work. NPS also administers the National Wild and Scenic Rivers System, the National Register of Historic Places, the Historic American Buildings Survey, and the Historic American Engineering Record. The agency is headquartered in Washington, DC.

RECORDS MANAGEMENT BACKGROUND

Oversight responsibility for records management in NPS is located at headquarters within the Directives and Paperwork Management Branch of the Administrative Services Division, which is under the Assistant Director for Personnel and Administrative Services. At present, one headquarters staff member is assigned to administer the service-wide records program and serve as the official agency Records Management Officer (RMO). This RMO, whose position is not highly graded, has responsibility for providing records management guidance to the regional offices, which in turn are responsible for guiding the programs at parks and other sites. In addition, NPS requires a designated individual at each site and regional office to perform records management responsibilities.

The NPS Records Management Guideline (NPS-19) details agency records policies and procedures. Appendix B of the guideline provides NARA-approved disposition authorities (this appendix is also known as the agency records schedule). The schedule is keyed to a functional filing system: documents are identified and described in generic terms rather than in the context of the offices that create and maintain records. NPS audiovisual records are included in the manual under file code "K," Interpretation and Information. There are generic schedule items covering motion pictures, still photographs and slides, television recordings, and posters.

TRANSFERS TO THE NATIONAL ARCHIVES

The National Archives has accessioned relatively few audiovisual records from NPS. The Cartographic & Architectural Branch has 61 aerial photographs; the Motion Picture, Sound & Video Branch has 17 motion pictures and 126 sound recordings; and the Still Picture Branch has 17,304 photographs. These holdings are far from complete for any aspect of NPS history, and there has not been regular, systematic transfers of permanent records from the agency to the National Archives. It is worth noting that the Harpers Ferry Center has recently transferred several dozen posters to the Still Picture Branch, and has agreed to transfer future posters as they are published.

II. AUDIOVISUAL RECORDS MANAGEMENT

GENERAL

NPS makes broad use of audiovisual records in a number of areas. Slides, videos, and motion pictures are used extensively as interpretive and visitor services tools at all sites. Park rangers and other staff use photographs and slides to manage natural resources. All varieties of audiovisual records are included in the many museum collections present throughout NPS.

NPS is an eclectic assemblage of sites, each of which has a singular history. From the beginning, these properties were designated for special recognition to preserve their unique character for posterity. Many NPS elements have active and independent programs to collect, preserve, and control objects and other evidence that illustrate the character and history of the sites. In many cases these documentary collections include both private items and Federal records. NPS generally claims an ongoing need to use these records for its historical research, site interpretation, and public education activities. In addition to collecting audiovisual records, NPS also generates a significant number of motion pictures, videos, slide shows, and still photographs in its interpretive and educational programs.

This evaluation has identified a number of problems with the NPS records management program in the area of audiovisual records. These include limited awareness of the NPS records management program--and hence NARA regulations; poor implementation of the NPS records schedule; inadequate records training; and no effective program of internal evaluations. An overview of these issues is provided below.

AWARENESS OF NPS RECORDS MANAGEMENT

The NPS records management program is the primary vehicle for implementing NARA regulations relating to Federal records. The requirements of this program are not effectively communicated throughout the agency, so that none of the sites visited were familiar with NARA's regulations concerning creation, maintenance and use, and disposition of audiovisual records. None of the sites were in full compliance with 36 CFR Part 1232 regarding storage conditions and formats for permanent and unscheduled records. Fragile audiovisual records are thus stored in areas without the strict temperature and humidity controls that will ensure the long-term protection and preservation of these valuable records.

Three places--the Harry S. Truman National Historic Site, Denver Service Center, and Jefferson National Expansion Memorial--were

familiar with NPS-19, although even these sites applied the schedule selectively, and none of the three had sent audiovisual records to the National Archives. The other sites knew little, if anything, about NPS-19. They also had no other printed directive or any other type of formal guidance concerning records management. Another problem was confusion about who is responsible for records management within NPS. Morristown National Historical Park and Edison National Historical Site claimed, for example, that the North Atlantic Regional Office was responsible for applying NPS-19 to their records, despite the fact that staff limitations at that office have prevented comprehensive application of the schedule for the last 15 years. The frequent turnover in Park Service personnel handling records contributes to these problems.

Six sites store large amounts of nitrate film negatives: Morristown; Independence National Historical Park; Truman; Yosemite National Park; Grand Canyon National Park; and Mt. Rainier National Park. Several of these sites store nitrate with other documentary collections. This is not recommended, as nitrate film is highly unstable and a distinct fire hazard. NARA regulations call for removal of nitrate from records storage areas and placement in vaults meeting National Fire Protection Association standards. The negatives should be offered immediately to the National Archives for review and appropriate disposition. In addition, the Western Archaeological Conservation Center has a very large collection of early diacetate negatives that have not been transferred to stable media. NARA regulations stipulate that deteriorating films of this type be offered to the National Archives as well.

RECORDS SCHEDULE COVERAGE AND IMPLEMENTATION

NPS has very general records schedule coverage for audiovisual records. Basically, the schedule calls for transfer of still photographs, slides, and motion pictures to the legal custody of the National Archives when the material is 10 years old. There are no items that explicitly cover videotapes, oral history and sound recordings, or motion picture preprint material (negatives, A and B rolls, interpositives, and so forth). Application of the schedule appears to have been stymied by a combination of limited knowledge of the NPS records management program, the general nature of the schedule, and a prevalent view within the agency that audiovisual records are either museum objects or needed for ongoing administrative purposes. The resulting irony is that NPS, the Federal agency with perhaps the broadest and most long-standing historical mission, is very poorly represented in the archival holdings of the U.S. government.

DECENTRALIZED AUDIOVISUAL CREATION AND MAINTENANCE

The evaluation found that all sites visited exercise largely autonomous control over their audiovisual records. While sites reported some occasional guidance from the Harpers Ferry Center, all claimed that most decisions regarding audiovisual materials were made locally. This situation reflects in part the limited awareness of NPS and NARA recordkeeping requirements. Maintenance of audiovisual records in site museum collections is another contributing factor, as is individualized use of them for curatorial, interpretive, and resources management functions.

In addition, many NPS staff take their own photographs and make their own audio and video recordings. In the past, NPS had a few designated staff members who were responsible for creating official audiovisual records. Such designations are no longer used. At Statue of Liberty National Monument, for example, technicians create photographs and slides, while contractors record oral history interviews. Edison has staff and contractors from the Curatorial and Visitor Services Divisions filming employees, buildings, artifacts, events, and site scenes. Three of Morristown's six divisions produce potentially permanent audiovisual records. At Truman, audiovisual records are created by museum aids, park rangers, and historians working for or contracted by NPS. Similar situations were found at other places.

Decentralized creation and maintenance of audiovisual records is increasingly evident throughout the government, in part the inevitable result of changes in technology and general recordkeeping practices. However, this decentralization, particularly in an agency like NPS with a large and complicated collection of audiovisual records, needs to be balanced by a reasonable amount of records management guidance and control from headquarters to ensure the maintenance of appropriate standards. All of the sites visited lacked formal guidance for creating and maintaining audiovisual materials and most expressed a need for such guidance.

TRAINING

Many personnel with audiovisual responsibilities have had some related training, particularly in the curatorial area. NPS offers an 80-hour course in curatorial methods that touches upon preservation needs of museum collections, including photographs. This excellent course treats the full spectrum of objects contained in NPS museum collections, but does not stress records management issues or NARA regulations. NPS offers no training programs that address records management concerns and NARA's requirements concerning the creation, maintenance, and ultimate disposition of audiovisual records.

It speaks well of the professionalism of NPS employees that many personnel contacted for this evaluation were interested in training that would allow for improved audiovisual management. Mt. Rainier, Yosemite, Jefferson, Edison, and the Denver Service Center expressed particular interest in expanded audiovisual training. Some NPS headquarters staff knew about NARA's training courses, but few field staff were similarly informed.

INTERNAL EVALUATIONS

None of the sites visited indicated that there is any effective NPS program to evaluate the management of audiovisual records. While certain related aspects are subject to internal review and scrutiny--such as Scope of Collections Statements and museum cataloging procedures--sites are in effect left to their own devices concerning creation, maintenance, and disposition matters.

NPS does, however, have a general evaluation process in place that could address some of the problems with audiovisual materials. On a recurring basis, all NPS regional offices are visited by a headquarters team for the purposes of an operational evaluation. Field sites are evaluated in much the same manner by regional teams. These evaluations are intended to improve communications; identify significant issues; improve accountability; measure productivity; acknowledge creativity; and provide quality assurance over a broad range of administrative and program functions.

The teams work from a prepared set of questions relating to specific activities. Each evaluation makes recommendations and suggestions for improvement, and also notes significant achievements as appropriate. Recent sets of questions from evaluations of regional offices contained several sections that, with more focus, emphasis, and senior management support, could be very effective in improving audiovisual records management. For example, section 1.09.7 (Office Services, Paperwork and Records Management) contained queries regarding the status of directives defining the policies, authorities, goals, and procedures of the records program; the establishment of official records series; identification of permanent records series; and transfer of permanent records to the National Archives according to the terms of approved records disposition schedules. There are also sections pertaining to training, collections accountability, collections storage, and collection management planning and program oversight. There is no indication, however, that NPS has used this mechanism to evaluate the management of audiovisual records. In addition, NPS does not appear to currently use professional archival or records management expertise for these evaluations.

RECOMMENDATIONS

II/1. Develop clear and consolidated recordkeeping requirements for all of its audiovisual records. These requirements should specify the kinds of records that must be created and maintained to adequately document NPS activities and meet program responsibilities, as well as who is responsible for the creation and appropriate maintenance of these records. For the development and enforcement of these recordkeeping requirements to be effective, this effort will need senior management support, and must be supplemented by appropriate training and program evaluation (see II/4,5).

II/2. Take immediate steps to comply with NARA regulations for nitrate film and unstable safety base film. The nitrate material needs to be segregated and housed under appropriate conditions and both need to be offered to the National Archives as soon as possible.

II/3. Take measures to ensure that all sites are familiar with other NARA regulations concerning audiovisual records and are systematically working toward better compliance with these regulations.

II/4. Revise the NPS records schedule to make it complete, clear, and workable for audiovisual records. As part of this effort, the schedule needs to be modified to include video recordings, oral history and sound recordings, and motion picture pre-print material. The schedules need to be sufficiently specific to agency programs so they can be easily implemented. Within each medium, in order for NPS staff to identify permanent records, the schedules should describe subjects appropriate for permanent retention, for example basic documentation of park activities and features, and those considered disposable, for example management training, or "how to" films not specific to the Park Service mission. All record elements should be listed, and workable cut off and transfer dates should be provided.

II/5. Include coverage of NARA regulations and records management requirements for audiovisual records in the NPS curatorial methods course. The agency should develop additional records management training relating to creation, maintenance, and disposition of the large volume of audiovisual records in its custody. NPS staff should be sent to NARA training courses as appropriate.

II/6. Use and expand the current NPS evaluation program as a means of measuring compliance in regions and sites with agency recordkeeping requirements and procedures, and NARA regulations regarding audiovisual records. These internal NPS evaluations should make use of staff with records management and archival expertise.

III. MUSEUM COLLECTIONS AND FEDERAL RECORDS

A key issue in the management of audiovisual records in NPS is how the records are classified. If they are seen as museum collections, one set of procedures and standards are applied; if they are seen as Federal records, they are treated differently. These distinct approaches do not overlap.

Records treated as museum collections are considered by NPS as beyond the scope of NPS records management control and NARA regulations. For personal papers or other collections originating outside the agency, designation as museum objects is without complication; the personal papers and corporate records of Thomas Edison held by the Edison National Historic Site are an example. Such collections do fall outside the scope of NARA's concern, and it is appropriate that the agency manage them independently. However, when Federal records with historical value are considered museum objects, NARA has a number of concerns, including the preservation of and access to such records.

NARA has responsibility for prescribing policies and procedures for managing records to ensure adequate documentation and appropriate disposition. This responsibility is based on Federal statute (44 USC) and regulation (36 CFR), which set forth both a definition of Federal records and procedures for determining their ultimate disposition. Statutes and regulations also require that Federal records appraised by NARA as permanent be transferred to the legal custody of the National Archives after an appropriate length of time and when no longer needed by the agency for current business. NARA's mandate covers all Federal agencies and all Federal records, regardless of media.

NPS has a legal mandate to collect and preserve objects for the benefit of the general public. An assemblage of these objects is designated as a museum collection, and must be gathered according to some rational scheme. A recent NPS survey estimated that the agency has over 25 million such objects in its collections, including furniture, tools, flags, clothing, botanical specimens, and archaeological items. Museum collections are largely held by individual parks and other sites, although administrative entities such as the Western Archaeological and Conservation Center also have significant collections. Each site is required to develop and use a Scope of Collection Statement, which defines the types of objects that are appropriate for acquisition in order to promote understanding and interpretation of the site. These statements delineate general NPS mandates, as well as any that are specific to the site. (For example, Congress established Morristown National Historical Park to preserve "areas of Revolutionary War interest at and in the vicinity" of Morristown, NJ; specific provisions are included for

establishment of a museum and library.)

NPS has detailed provisions for treating archival and manuscript collections--many of which include or consist entirely of audiovisual materials--as museum objects. Most of these provisions are codified in the NPS Museum Handbook, which includes guidance concerning agency cataloging procedures for museum collections, generally done at the item level. The handbook contains extensive preservation information for audiovisual materials, particularly photographs. NPS also issues periodic information in addition to the handbook. A series of "Conserve O Grams", for example, treats subjects such as storage areas for archival photographs, arrangement of photograph files, and identifying various types of 19th century photographs. This guidance is overseen by the Curatorial Services Division, which is also responsible for coordinating all site curatorial planning documents, including Scope of Collections Statements and Collection Management Plans. This division is staffed with well-trained and experienced professionals; the one area where it could use more expertise is in archival matters. As NPS has extensive archival holdings--as well as some difficult issues connected with these holdings--the agency could make profitable use of a staff archivist.

While the guidance of the Curatorial Services Division is excellent and appropriate for museum collections, in some cases sites are applying these policies and procedures to Federal records. All the sites visited had audiovisual items that were created by NPS employees in the course of official duties, but these items are commonly viewed as non-record material. The Mid-Atlantic Regional Office--with administrative oversight responsibility for multiple sites--stated that many NPS offices do not consider audiovisual materials to be records. Yosemite also claimed to be unsure about how to identify Federal audiovisual records. But while many NPS-generated audiovisual items are not seen as records--and hence outside the scope of the NPS records management program--they are routinely seen as museum objects to be dealt with under the authority of the Museum Handbook and related issuances. Yosemite, Truman, Grand Canyon, and Ellis Island all stated that the handbook was used exclusively for audiovisual creation and maintenance; Morristown considers audiovisual materials as either museum objects or as short-lived educational tools. WACC goes a step further and serves as a regional repository for audiovisual material from multiple western sites; all but "non-historical" items are considered museum objects governed under curatorial authority.

This situation raises a number of issues and concerns. Many elements within NPS are far from compliance with NARA regulations concerning creation, storage, scheduling, and disposition of audiovisual records in the museum collections. This non-compliance affects the preservation of these permanent

audiovisual records, their eventual transfer to the National Archives, and ultimately the quality of the historical record for NPS.

By choosing to retain a vast quantity of fragile material requiring special storage and treatment, NPS must commit a correspondingly large amount of resources to maintain this material. There are indications that the agency is having trouble meeting this responsibility. The National Park Service Plan for Museum Collections Management (revised 2/89) notes that "the rapid growth of [museum] collections has far outpaced the staff and resources assigned to their care." A 1985 report from the Office of Inspector General cited a lack of accountability and adequate storage conditions for NPS museum collections. WACC states that funds for collections management are a continuing problem, especially for preservation needs. One of the major reasons behind regulations calling for transfer of audiovisual (and other) records with enduring value to the National Archives is to provide the U.S. government with a cost-effective means of preserving and making available these records.

In NPS, a weak records management program competes with a developed program for managing artifacts and related archives that include Federal records. Strong and continuing guidance and direction comes from headquarters for the latter, but not the former. Although usually unfamiliar with the schedule, NPS-19, almost all the NPS staff interviewed for this evaluation were familiar with the Cultural Resources Management Guideline (NPS-28) and the NPS Museum Handbook. In some ways, the existence of this collecting program works against records management, since there is an assumption by NPS field staff that materials not accessioned into NPS museum collections are not permanently valuable, nor controlled by statute or regulation. This is particularly true for audiovisual materials. Consequently, Park Service audiovisual records documenting major activities and programs, but not a part of museum collections, are less likely to be preserved. These records can be important for the effective long term administration of the parks and their programs, as well as for historical research.

Because of their shared responsibilities, NARA and NPS will both benefit from continued cooperative efforts, such as the Working Group recently established with senior representatives from both agencies. NPS is in the process of automating its museum collection descriptions and NARA is involved in a similar process for its archival holdings. Another area for cooperation would be sharing this automated collection data. Even with stricter guidance and controls, some records will inevitably be absorbed into museum collections. Sharing automated collection data will allow NARA to monitor these records and work in conjunction with the Park Service to provide information about them to researchers.

RECOMMENDATIONS

III/1. Formally clarify the distinction between audiovisual records and museum objects (including privately donated, purchased, and loaned material) and the consequences of this distinction, in a manner consistent with Federal law and NARA regulations. Regional offices and sites require ongoing guidance in this area, which should stress the necessity of preserving the provenance and original order of Federal records.

III/2. Revise the NPS Museum Handbook and other forms of curatorial guidance (such as information relating to Scope of Collection statements), to include and explain NPS and NARA recordkeeping requirements. This curatorial guidance should also make a clear distinction between Federal records and museum objects in order to appropriately limit the amount of Federal records absorbed into these collections. The goal is for NPS to mesh its standards with NARA's to form a workable system that appropriately defines museum collections and protects Federal records, thus ensuring that documentation responsibilities are fully and effectively carried out.

III/3. Identify Federal records currently incorporated in museum collections and take steps to manage them in accordance with NARA regulations.

III/4. Consider the use of transfers to NARA of audiovisual records already in museum collections as a way to reduce the administrative burden upon NPS for long-term management of such materials.

III/5. Hire an archivist in the curatorial division to formulate specialized guidance and policy for audiovisual archival collections, which may include Federal records, and to participate in training and evaluation activities.

III/6. As part of continuing cooperative efforts, work with NARA to investigate the feasibility of sharing automated collection information.

IV. MAJOR NPS AUDIOVISUAL COLLECTIONS: CREATION, STORAGE, AND DISPOSITION

As noted, NPS maintains significant collections of audiovisual materials as part of its responsibility to preserve and interpret sites. These materials are used to prepare interpretive slide shows; mount exhibits and publications; maintain internal accountability; and assist various researchers. Collections are located at NPS headquarters, specialty centers, regional offices, and many field sites. Several important series and collections, reviewed as part of this evaluation, are described below. They illustrate a number of the records management issues raised by this evaluation.

HARPERS FERRY CENTER

The largest and most significant collections of older NPS audiovisual records are under the control of the Harpers Ferry Center (HFC). HFC is a centralized production and technical service facility that generates exhibits, graphic arts, publications, and various audiovisual materials for the NPS system. The facility also provides museum curatorial services, as well as library, archival, and oral history guidance.

The HFC Division of Audiovisual Arts (DAA) produces approximately 100 slide shows, motion pictures, videos, and audio recordings for parks and other sites each year. A show typically originates with a site, which send slides to HFC for narration and music. Most shows use 35mm color slides, although the larger format Hasselblad slides are coming into increasing use. DAA also produces audio recordings for site audio stations, which are common interpretive tools. DAA retains copies of each slide and audio production; about 1,000 productions dating from the 1960s to the present are in its custody.

Motion pictures are shot either by DAA staff or, more commonly, by contractors. Most of the preprint elements are stored at commercial laboratories, although DAA maintains ownership of this material. The preprint is well inventoried, but DAA speculates that the laboratories do not provide storage conditions that meet 36 CFR requirements. Some printing from negatives and intermediates is allowed, as are loans to other agencies and third parties. DAA retains copies of each production (approximately 300 items dating from 1965 to the present), as well as outtakes, trims, and other materials in a stock film library. Video productions consist of originals as well as copies made from films. Unlike many other Federal programs, the Park Service is not broadly replacing film with video; large viewing audiences and a concern for technical quality have limited video productions up to this point. DAA retains masters

(one-inch) and copies (one-half inch) of video productions (approximately 170 productions are stored on site). HFC also maintains about 60 cubic feet of textual files documenting audiovisual productions from 1965. The files are arranged alphabetically by park, and typically contain a shooting script, lab and processing forms, financial information, correspondence, and production evaluation information.

DAA is doing a good job of maintaining control over creation and use of audiovisual records. Completed productions are numbered, inventoried, and documented in production files. The staff is knowledgeable, concerned about the records, and well aware of their value. DAA claims, however, that nearly all of this material has continuing administrative value in the production of new films, as well as to meet reference requests from NPS and non-NPS film producers. DAA receives an average of three reference requests per day--mostly from private film producers--and feels that only "obsolete" productions are suitable for transfer to the National Archives. DAA would, in addition, make any such transfer through the HFC library and archives (see below). DAA has received almost no records management guidance and has only a very limited awareness of the NPS records program, including the records schedule and the requirement to transfer archival material to the National Archives at established intervals. Moreover, use of commercial laboratories to store 23 years of film preprint material is of concern. Such facilities do not provide adequate protection, security, or environmental controls.

HFC also has an Office of Library and Archival Services (OLAS). The library collection focuses on natural history, American social history, material culture, and the National Park Service. The primary clientele is HFC staff, although all NPS elements are also served, as is the general public. The other component within OLAS is the NPS History Collection. This collection aims to illustrate NPS history and culture through an assemblage of documents and artifacts. Documents include personal papers of NPS employees and others associated with national parks; records of cooperating associations and various other organizations associated with NPS; an assortment of official NPS publications; and what OLAS describes as photocopies and duplicates of official NPS records. The History Collection also contains a largely uncataloged body of photographs, posters, motion pictures, videos, and sound recordings (including approximately 20 cubic feet of oral history tape recordings); many of these items may be record material. The items apparently have been collected from parks, the NPS headquarters public affairs office, and from various present and former NPS employees. Among the most significant items in this collection is a film shot in the 1920s by NPS director Horace Albright. The original was on a 16mm film and was badly shrunken. HFC has transferred the film to one-inch master video; one-half inch VHS video copies have also been made.

Other audiovisual elements of the collection include audiotapes of NPS Director staff meetings; public service announcements; and various phonograph records.

OLAS staff are aware of the NPS records schedule (although it is viewed as very limited in its applicability and usefulness at HFC) and the requirements for archival material to be transferred to the National Archives. OLAS does not view its documentary collections--including the audiovisual materials--as Federal records, however. The materials are instead seen as either non-record or as personal papers. Absent a fuller description of the audiovisual items, this assertion is difficult to verify. But the presence of items such as official speeches, public service announcements, and films of national parks suggests that records are indeed present to some degree.

In addition to its HFC facility, OLAS also has administrative control over several large photographic collections located in the Bureau of Graphics Research (BGR) in Springfield, VA. These collections, which are estimated to total over one million images, have different origins. Generally, they were either created through central NPS functions (such as shots taken by chief NPS photographers) or they were created at the parks and sent to the Washington NPS headquarters. Some items were the personal property of persons associated with NPS, and are not considered records (BGR holdings are also not considered to be part of the NPS museum collection). The facility serves as the central NPS photographic repository, and many of the images do not exist elsewhere. According to BGR, many parks that sent photographs have subsequently lost their own copies.

The BGR collections consist of several series or groupings (see appendix A for more detail regarding these collections), which date collectively from ca. 1900 to the present. In most cases, both negatives and prints are available for these images. According to BGR, some of the older negatives in these collections were in nitrate format, and have been copied onto stable media. A section of the facility is set up for storage of negatives, is maintained at a constant temperature and humidity, and is protected by a halon gas system. Other elements of the BGR holdings are not stored in a regulated environment. There are a variety of finding aids for the material, but these aids are in many cases incomplete or cursory. BGR staff are unfamiliar with the NPS records management program, including schedule provisions for photographs. A number of BGR series of older photographs were previously appraised for transfer to NARA before they were moved into this facility.

The NPS Office of Public Affairs Photographic Library in Washington, DC, contains a collection of slides and photographs taken in national parks dating from 1950 to the present (5,000

and 3,000 images, respectively). These consist largely of copies made from BGR holdings, although some images have been sent directly from the parks. The extent to which the OPA collections overlap with those of BGR is unknown. An in-depth survey is needed to compare these materials; if the OPA images fully duplicate those at BGR, it is possible that some of the latter materials can be designated as disposable.

Overall, HFC personnel are concerned and motivated with regard to caring for the audiovisual collections and for the most part are strongly aware of the historical value of these items. Some sound efforts have been made to safeguard them. However, the collections are administered in a very decentralized, autonomous manner, and there are significant shortcomings in the management and storage of these records. HFC collections remain outside the control of NPS records management, and there has been no effort to provide for the identification and transfer of permanent records to the National Archives. No comprehensive, series level inventory of the HFC audiovisual collections (DAA, OLAS, BGR, and the OPA material) has been done, on which improved management and scheduling, and appropriate transfers could be based.

YOSEMITE NATIONAL PARK

Another NPS entity with important archival holdings of audiovisual records is Yosemite National Park (YNP). The YNP Curatorial Branch administers nearly all YNP audiovisual materials through the park's museum, library, and archives. Photographs and slides constitute the major components of the audiovisual collection. The photographic items document various aspects of the park and its history from 1880 to the present, and consist of approximately 23,000 negatives, both color and black and white. Included is a mixture of non-Federal and YNP generated materials. The private materials have diverse origins, and have been variously purchased by or donated to YNP. The records consist of images taken for interpretive programs, as well as shots originating from other park divisions. The collection is accessed through a subject index consisting of contact prints on aperture cards that are filed by designated subject. Both the negatives and the index are arranged as single units, with no distinction made between Federal records and privately acquired materials. The only way to do so at this point is to identify photographer affiliation: presumably those shot by NPS employees are Federal records. YNP estimates that about half of the collection is record material.

Other YNP photographic holdings include 1,000 glass plate negatives, and a limited number of albumen prints and collodion negatives. The museum has over 20,000 nitrate negatives on hand; YNP has transferred 15,000 of these negatives to stable media, and has done the same for about 60,000 negatives from other

parks. YNP stores nitrate film in a refrigerator in the museum. All negatives are stored in acid-free containers in an area protected by halon gas; the temperature and humidity are monitored, but not controlled. As the museum building is made chiefly of stone, temperatures in the storage room tend to be stable. YNP also has 60,000 slides taken by the park public information officer, official park photographer, various park employees (in official and unofficial capacities), and private individuals from ca. 1935 to the present. As with the photographs, about half the collection is estimated to be record material. The slides are used primarily for interpretive shows, and are destroyed when judged to be obsolete.

YNP is for the most part doing a good job maintaining and controlling its audiovisual materials. Park staff, moreover, are competent and concerned. But YNP does not apply the existing NPS records schedule to these audiovisual collections, and the park has no plans to transfer any of the materials to the National Archives. The photographs are looked upon as museum objects that must always remain at the park; the slides are seen as having indeterminate administrative value for interpretive programs. Of particular concern is the presence of large quantities of unstable and flammable nitrate negatives in the collections. YNP also needs better awareness and control mechanisms for Federal records that have permanent value; physically mixing such materials with non-Federal items is not sound archival practice.

GRAND CANYON NATIONAL PARK

Grand Canyon National Park (GCNP) has custody of a number of significant audiovisual collections divided between its curatorial and resources management functions. The former material is contained within the park's museum collection, and includes over 17,000 items dating from ca. 1880 to the present (each item is represented variously by prints, negatives, slides, or combinations). Subjects cover many aspects of park history, including structures, construction, visitors, and interpretive activities. GCNP uses the collection for publications, administrative and scientific studies, and to meet reference requests from NPS and the general public. An index to subjects and photographers is present. Between 500 and 700 nitrate negatives are included; a project is underway to copy these items onto safety film. GCNP estimates that about a quarter of these items have been acquired through donation, purchase, or loan. The museum also has about 1,000 glass lantern slides dating from the 1930s. The slides are on permanent loan to the museum from the estate of the originator of the material, Emery Kolb, and depict various aspects of Indian folklore and Grand Canyon scenes.

The museum collection also includes groupings of audio tapes and

motion pictures. The audio tapes consist of about 40 reels and relate to oral history interviews, speeches, briefings, and interpretive talks. Some of the tapes have been donated by private individuals or groups; other items were created by NPS employees. The motion pictures consist of approximately 50 reels of 16 mm film documenting river expeditions, railroad scenes, Indian folklore, and aerial views. Most of the films have been donated from private sources; half the film is on nitrate based media.

The major category of audiovisual materials under the control of GCNP resources management consist of approximately 10,000 archaeological site photographs dating from the 1950s to the present. Included are color slides, black and white negatives, and prints. Nearly all were shot by NPS employees to document changes in archaeological sites within GCNP.

GCNP is striving to properly maintain and control its audiovisual materials. Park staff, as at other sites, are competent and committed. But, again as with other sites, GCNP does not apply the NPS records schedule to its audiovisual collections, and the park has no plans to transfer any of the materials to the National Archives. The museum photographs are looked upon as objects that must always remain at the park; the slides are seen as having indeterminate administrative value for interpretive programs. While elements of the collection merit transfer to the National Archives based on their historical value alone, the presence of unstable and flammable nitrate negatives is also a compelling reason for transfer, particularly since none of the materials are stored under environmentally controlled conditions.

MT. RAINIER NATIONAL PARK

Potentially archival photographs, slides, and motion pictures are also present in Mt. Rainier National Park (MRNP). The MRNP interpretive section maintains a park-designated archival collection consisting of 25 cubic feet of black and white photographic prints dating from ca. 1920 to the 1950s. The images pertain to various aspects of MRNP, including a significant body of material documenting park appearance during the 1930s and 40s. Some of these items have been donated to the park by private persons and organizations. This material has been intermixed with NPS-generated items to form a single series. The archival collection also includes 60 reels of 16mm motion picture film dating from the 1920s to the 1950s. The films pertain to interpretive and other programs, and consist of originals and copies. Acid-free materials have been used, although no environmental controls are in place. In addition, the natural resources element at MRNP has custody of relatively small, recent collections of slides, prints, and negatives.

The MRNP Longmire Museum has custody of an additional 25 cubic feet of photographs and slides documenting park landscapes and activities from the 1920s to 1980s. The museum also has a small collection of glass lantern slides depicting park scenes dating from the 1920s, as well as 3,000 negatives dating from ca. 1925 to the 1950s. Nitrate negatives are included and there is a project underway to convert them to safety film. The nitrate materials are eventually scheduled to be stored in a freezer, but are now stored with the rest of the collections. The negatives may include unstable safety film as well as nitrate. As with the interpretive collections, the museum holdings are not stored under strict environmental controls.

MRNP has taken some steps to preserve its audiovisual collection, and park personnel are competent and aware of the collection's value. Awareness of provenance--including the identity of Federal records--is weak, the material exists outside of NPS records management controls, and the park assumes that records will remain on site in perpetuity. Audiovisual storage areas lack proper environmental conditions, and unstable nitrate negatives are maintained with the rest of the collection.

WESTERN ARCHAEOLOGICAL AND CONSERVATION CENTER

The Western Archaeological and Conservation Center (WACC) in Tucson, AZ, has very extensive holdings of potentially permanent audiovisual records associated with sites in the NPS western, southwestern, and rocky mountain regions. WACC has a mandate from NPS to serve as a repository for cultural and natural resources collections--and associated documentation--for these regions. These holdings fall into two primary groups: historical photographs, consisting of 55,000 black and white negatives of scenes from various parks taken from ca. 1900 to 1960; and 70,000 negatives and slides pertaining to archaeological sites and projects. These items are held by the WACC Library/Archives. Negatives are stored individually in acid-free sleeves; slides are stored in inert sheets.

The WACC collections are housed under controlled environmental conditions, and Library/Archives personnel are familiar with audiovisual preservation literature and techniques. While indexes and finding aids to these audiovisual materials are rather limited, the major problem faced by WACC with regard to these collections is the overwhelming presence of cellulose acetate negatives. It is estimated that 90 percent of the negatives are on this unstable safety base film; some attempt has been made to identify the most severely deteriorated negatives and place them in cold storage. WACC regards these collections as museum collections that the institution is required to store and preserve. The NPS records schedules are not considered to apply to these records, and WACC has never sent audiovisual

records to the National Archives.

RECOMMENDATIONS

IV/1. Inventory existing NPS audiovisual collections at the series level, beginning with a comprehensive series level inventory of the entire Harpers Ferry Audiovisual collections (DAA, OLAS, BGR, and the OPA material). This inventory should include information about series content, location, media, record status, preservation needs, and ultimate disposition. NPS should use information from this inventory to supplement or amplify the existing records schedule, in order to make clear what records are covered and when they should be transferred. Where item level inventories exist for museum collections, these can simply be transformed into series level inventories for scheduling purposes.

IV/2. Transfer several segments of the Harpers Ferry Collection to the National Archives as soon as possible. These are older collections whose interest is primarily historical, rather than being needed for current agency business. See appendix A for a listing of these series. The photographic collections currently at BGR and listed in this appendix should be transferred to NARA directly, and not moved to the Harpers Ferry site.

IV/3. Take steps to transfer to the National Archives all audiovisual records eligible under NPS-19 located at Yosemite, Grand Canyon, Mt. Rainier, and WACC. For records that cannot be transferred to the National Archives in the near future, NPS needs to bring them into compliance with NARA regulations for maintenance and storage.

V. SUMMARY OF RECOMMENDATIONS

II/1. Develop clear and consolidated recordkeeping for all of its audiovisual records. These requirements specify the kinds of records that must be created to adequately document NPS activities and meet program responsibilities, as well as who is responsible for the creation and appropriate maintenance of these records. For the development and enforcement of these recordkeeping requirements to be effective, this effort will need senior management support, and must be supplemented by appropriate training and program evaluation (see II/4,5).

II/2. Take immediate steps to comply with NARA regulations for nitrate film and unstable safety base film. The nitrate material needs to be segregated and housed under appropriate conditions and both need to be offered to the National Archives as soon as possible.

II/3. Take measures to ensure that all sites are familiar with other NARA regulations concerning audiovisual records and are systematically working toward better compliance with these regulations.

II/4. Revise the NPS records schedule to make it complete, clear, and workable for audiovisual records. As part of this effort, the schedule needs to be modified to include video recordings, oral history and sound recordings, and motion picture pre-print material. The schedules need to be sufficiently specific to agency programs so they can be easily implemented. Within each medium, in order for NPS staff to identify permanent records, the schedules should describe subjects appropriate for permanent retention, for example basic documentation of park activities and features, and those considered disposable, for example management training, or "how to" films not specific to the Park Service mission. All record elements should be listed, and workable cut off and transfer dates should be provided.

II/5. Include coverage of NARA regulations and records management requirements for audiovisual records in the NPS curatorial methods course. The agency should develop additional records management training relating to creation, maintenance, and disposition of the large volume of audiovisual records in its custody. NPS staff should be sent to NARA training courses as appropriate.

II/6. Use and expand the current NPS evaluation program as a means of measuring compliance in regions and sites with agency recordkeeping requirements and procedures, and NARA regulations regarding audiovisual records. These internal NPS evaluations should make use of staff with records management and archival

expertise.

III/1. Formally clarify the distinction between audiovisual records and museum objects (including privately donated, purchased, and loaned material) and the consequences of this distinction, in a manner consistent with Federal law and NARA regulations. Regional offices and sites require ongoing guidance in this area, which should stress the necessity of preserving the provenance and original order of Federal records.

III/2. Revise the NPS Museum Handbook and other forms of curatorial guidance (such as information relating to Scope of Collection statements), to include and explain NPS and NARA recordkeeping requirements. This curatorial guidance should also make a clear distinction between Federal records and museum objects in order to appropriately limit the amount of Federal records absorbed into these collections. The goal is for NPS to mesh its standards with NARA's to form a workable system that appropriately defines museum collections and protects Federal records, thus ensuring that documentation responsibilities are fully and effectively carried out.

III/3. Identify Federal records currently incorporated in museum collections and take steps to manage them in accordance with NARA regulations.

III/4. Consider the use of transfers to NARA of audiovisual records already in museum collections as a way to reduce the administrative burden upon NPS for long-term management of such materials.

III/5. Hire an archivist in the curatorial division to formulate specialized guidance and policy for audiovisual archival collections, which may include Federal records, and to participate in training and evaluation activities.

III/6. As part of continuing cooperative efforts, work with NARA to investigate the feasibility of sharing automated collection information.

IV/1. Inventory existing NPS audiovisual collections at the series level; beginning with a comprehensive series level inventory of the entire Harpers Ferry Audiovisual collections (DAA, OLAS, BGR, and the OPA material). This inventory should include information about series content, location, media, record status, preservation needs, and ultimate disposition. NPS should use information from this inventory to supplement or amplify the existing records schedule, in order to make clear what records are covered and when they should be transferred. Where item level inventories exist for museum collections, these can simply be transformed into series level inventories for scheduling purposes.

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