To: Joint Steering Committee for Revision of AACR

FROM: Jennifer Bowen, ALA representative

SUBJECT: *5JSC/LC/3*: Rule Proposals for Archival and Manuscript Repositories

ALA has reviewed *5JSC/LC/3*, as well as the *CILIP response*, with the assistance of the Technical Subcommittee on Descriptive Standards of the Society of American Archivists (SAA). We commend the Library of Congress for its attempt to suggest a concise set of general rules for describing archival and manuscript resources that is consistent with archival principles and practices, and incorporates provisions from *Describing Archives: A Content Standard*. However, we find both of these objectives problematic.

The JSC faces a thorny decision: the question of whether to simply refer users to DACS, or to try to abstract information from either AACR2 or DACS into RDA. In short, there seem to be three basic options (as articulated by SAA):

1. Entirely removing all rules regarding treatment of manuscript and archival material from RDA (leaving only instructions for medieval and renaissance manuscripts, if needed) with pointers to appropriate standards such as DACS and ISAD(G).

2. Including (in some yet to be written section of RDA) an unambiguous statement recommending that other national and international standards exist for the description of archives and manuscripts. Pointers should be provided to ISAD(G) as the international standard and DACS as the US standard. Mention could also be made of other standards, such as the Canadian Rules for Archival Description, currently under revision. In addition, RDA might retain (while improving upon) those AACR2 Chapter 4 rules that treat both manuscript items and collections in an essentially bibliographic fashion, for those with individual or small numbers of manuscripts they wish to control **bibliographically** (as opposed to **archivally**).

3. The same as option 2, except incorporating information on archival description via DACS, rather than AACR2 Chapter 4, thus allowing some measure of archival control for these materials. This is the approach that *5JSC/LC/3* takes. It may allow a generalist cataloger who can't (or won't) use anything beyond a single cataloging code for the odd manuscript or collection to create a descriptive record for the catalog that is minimally compatible with those created using DACS et al.

General Recommendations

ALA recommends SAA's Option 2 (above) as a compromise that will allow enough guidance for those libraries that will not consult an archival standard but who still need to catalog manuscripts and collections.

Specifically, we recommend the following:

1. RDA should explicitly identify itself as a content standard for bibliographic description. It should acknowledge the existence of traditions of archival and museum description, should succinctly describe the types of resources and contexts in which the application of such traditions are preferable to bibliographic description, and should refer catalogers to relevant standards in these traditions. Explicit reference should be made to international standards, specifically to ISAD(G)[1] and ISAAR(CFP)[2], as well as to DACS. These points should be made in the General Introduction to RDA.

2. RDA should include sufficient guidelines for creating bibliographic descriptions of manuscripts and assembled collections. Just as one can provide an archival description of any resource, so one can provide a bibliographic description of any resource -- including manuscripts and assembled collections.

3. ALA supports the addition of appropriate archival **practices** (as opposed to **principles**) to RDA when those practices are relevant to the bibliographic description of manuscripts and collections. For the most part, the guidelines for RDA chapters 12-16 in *5JSC/LC/3* are appropriate in that sense, but the examples should perhaps illustrate cases that are more clearly of resources for which bibliographic description is appropriate. However, ALA does **not** support the LC recommendations for chapters 11 and for Parts II and III of RDA, which attempt to incorporate **principles** of archival description into RDA.

There are several reasons that we have misgivings about including DACS abstracts in RDA:

1. Since DACS is an American standard, writing it into RDA risks imposing an national standard on an international work, in a case where a separate international standard — namely ISAD(G), already exists. Further, if some elements of an archival standard are included within RDA, we would prefer that ISAS(G) be preferred when its provisions differ from those of DACS.

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[1] http://www.ica.org/biblio.php?pdocid=1
[2] ISAAR(CFP) is an international standard for describing archival creators. http://www.ica.org/biblio.php?pdocid=2

2. AACR has always been a content standard for **bibliographic** description, as opposed to other traditions of resource description, such as **archival** description and **museum** description. These are rich traditions, based on distinct principles and practices. AACR has never attempted to encompass all varieties of resource description; nor should RDA. While at some time in the future it will be possible for rule makers working in these traditions to develop jointly a comprehensive content standard, such an exercise has not yet begun, nor is the time ripe for it. Each community needs to work independently at an international level to codify its own principles and practices before it will be possible to attempt to merge them.

3. We believe that the attempt to "boil down" DACS into some basic principles is likely to lead to misrepresentation of the essential requirements of archival description. Aside from this, given the structure under which the information is presented in *5JSC/LC/3*, the information does not appear to be presented in a logical, orderly fashion. Elements of less importance are discussed before those that are absolutely key.

4. Finally, there would be the problem of keeping RDA up to date if DACS rules change significantly in the future.

Recommendations on Specific Rule Proposals in *5JSC/LC/3*

RDA 11.2.1 and 11.2.2. ALA does **not** support the LC recommendations for RDA Chapter 11. However, if the JSC decides to follow what we have called Option 3 as proposed in *5JSC/LC/3* — although this is not a decision that we endorse — we offer the following suggestions:

a. **RDA 11.2.2.** While DACS allows single-level descriptions, the practice is frowned upon, particularly for individual items. Any rule provided here should not encourage a cataloger unfamiliar with archival materials to catalog items or components of a larger body of materials without also creating and linking to a parent record. It would be helpful to summarize the need for multilevel description from ISAD(G). ISAD(G) is more clear on this point than DACS.

    We agree with CILIP about non-repetition of information. This coincides with DACS principle 7.3, "Information provided at each level of description must be appropriate to that level." This seems to be implied in the guidelines on multilevel description in the proposal, but perhaps should be stated more explicitly.

b. Following RDA 11.2.2, "Number of records" … we believe a section 11.2.3 "Elements of description" should be added. We suggest the following text, for this rule, abstracted from DACS, "Levels of Description":

"ISAD(G) specifies 26 high-level elements of description which may be used to construct a description of archival materials. Simple descriptive records can be created with a subset of these elements. At a minimum, any archival descriptive record managed in a bibliographic system should include the following elements: Reference Code (Unique Identifier), Title, Date, Extent, Name of Creator, Scope and Content of Materials, Conditions Governing Access, and Language and Scripts of Material. In addition, multilevel archival descriptive records should include information indicating the relationship of the whole resource to its constituent the parts or components. Additional rules for "optimal" and "value added" descriptions are specified in DACS. The principles of multi-level description are discussed in ISAD(G).

Alternately, this text could be incorporated into rule 11.2.2. While it is unrealistic to think that RDA should provide its users a full understanding of archival theory, we believe this added rule would add some context necessary to properly implement the specific rules that follow.

RDA Chapter 12. ALA notes that "name of creator" is a required, fundamental element of archival description. It would be useful to include this as an element in Chapter 12, "Identification of the resource," since "name of creator" is considered an "identity element" in DACS and a "contextual" element in ISAD(G). While creators are covered under Part II and III of RDA, the narrative description there seems less helpful than a specific rule might be.

RDA 12.1. Title. ALA agrees that the additional guidance on composing titles contained within 5JSC/LC/3 would be useful within RDA, if this guidance is given within a bibliographic, rather than an archival, context. It may also be helpful to include a few more examples of how to construct titles, particularly for what DACS calls "intentionally assembled" collections.

RDA 12.9. ALA agrees with CILIP that the MARC coding is inappropriate. SAA's response was to suggest adding an EAD-encoded example to bolster the idea that RDA is a data structure-neutral content standard. While ALA does not endorse this approach, SAA's comments raise some interesting questions about encoding of information. In particular they remind us that we are accustomed to recording some data in the form of coded data (fixed field codes) in the MARC record. The case in point is the recording of the location of a repository as a Country code. To some extent this is an issue of encoding of data and is not relevant to RDA; on the other hand, coded data is a fact of our lives and RDA should provide some guidelines about the validity of using codes to record data content -- either in general or for particular elements. Country and language are the examples that come most readily to mind.

RDA 13.3. Dimension. This rule will be useful in providing guidance for item-level description. If the JSC follows Option 3 and includes DACS rules within RDA, we

recommend adding wording to clarify that in archival practice dimensions are typically recorded under the extent element. There is no parallel rule to this in DACS.

RDA 13.6 and **15.1**. ALA agrees with CILIP that there are problems associated with conflating information about availability and existence of copies, as DACS does. This makes it harder to map to the RDA outline. If Option 3 is followed, we suggest that a separate element describing Conditions governing access (cf. DACS rule 4.2) be added.

RDA 14.2. The proposed RDA 14.2 deals with the name of the "Nature and scope"/"Scope and content" element. We need to remember that the rule at issue is not a specific rule applicable to archival and manuscript resources, but a general rule applicable to **all** resources. In this case, this element has generally been called "Nature and scope" in AACR2, while the content has been dealt with in the Contents note; a narrative description of the content has been included in the Summary note. Archival practice does not distinguish these, but AACR does and we recommend that RDA continue to do so.

RDA 14.10. Administrative/Biographical History. The first sentence could be qualified more to suggest that the note should pertain specifically to the person or organization primarily responsible for creating or accumulating the records.

RDA 15.1. Under "Terms of Availability" the information is presented in a confusing order. Why is a statement made first about availability of materials **not** held by the repository (whether original or copies)? The name and location of the repository actually holding the described materials is obviously a more fundamental piece of information. Information regarding the availability of originals and copies is already dealt with under 13.6, so it is unclear why it should also be duplicated here.

We accept CILIP's point that the name and location of repository is not a mandatory element in ISBD(G). However, we feel that this is a mistake in ISBD(G) that should not be repeated in RDA.

RDA 16.2. "Provenance" is the wrong word here, since "provenance" has a more technical meaning that is inappropriate here. "Source of acquisition" is more appropriate.

RDA Parts II and III. ALA does not support the attempts within *5JSC/LC/3* to incorporate the **principles** of archival description into RDA.

Part III. ALA agrees with CILIP that the style here could be improved. We are unable to see what exactly should be offered for inclusion in Part III based only on the outline in the RDA Prospectus. The key point that RDA should include here is that the archival context provides a richness not typical of non-archival authority records.

Finding aids element. ALA would accept either the definition of a new note element for finding aids (as recommended by LC) or the inclusion of finding aids in the Index element (as recommended by CILIP).

Crosswalk. ALA supports the CILIP suggestion to add ISAD(G) elements to the crosswalk.