To: ALA/ALCTS/CCS Committee on Cataloging: Description and Access

From: Mary Lacy, Society of American Archivists liaison

Subject: Comment on Rule Proposals for Archival and Manuscript Repositories

The following is a document sent by Christopher Prom, Chair of the Technical Subcommittee on Descriptive Standards of the Society of American Archivists to Barbara Tillett, LC Representative to the Joint Steering Committee.

The Society of American Archivists appreciates the opportunity to comment on the suggested rule proposals for archival and manuscript resources listed in your memo of August 1, 2005 (*5JSC/LC/3*). Our Technical Subcommittee on Descriptive standards has reviewed the proposal in detail, and hope the information in this memo will be of assistance to the committee as it undertakes a difficult task.

We say difficult because it seems to us that the committee 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 3 basic options, each of which has drawbacks.

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 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 those Chapter 4 rules which treat manuscript items and collections in an essentially bibliographic fashion, for those with individual or small numbers of manuscripts they wish to control bibliographically.

3. The same as option 2, except incorporating information on archival description via DACS, rather than AACR2 Chapter 4. This is the approach the current draft 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 which is minimally compatible with those created using DACS et al.

The committee believes option one outlined above to be the best, but grants that option 3 has a certain attraction as well. There are several reasons we have misgivings about including DACS abstracts in RDA. First, and most fundamentally, 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 was presented in the draft, 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. Third, 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. Finally, there will be the problem of keeping RDA up to date if DACS rules change significantly in the future.

If the JSC decides to follow what we have called option 3 — and we believe this is a legitimate decision although not one we endorse — we offer the following suggestions:

a. Explicit reference should be made in a prefatory section to international standards, specifically to ISAD(G)[1] and ISAAR(CFP)[2], as well as DACS. We believe a paragraph should clearly state that the rules are abstracted from DACS, but that DACS is the US manifestation of ISAD(G), and that those describing archival resources should use those standards. This paragraph should refer users of RDA specifically to DACS and ISAD(G) for advice in describing archives and manuscripts, but leave open the option of using the RDA rules if an isolated manuscript or set of manuscripts is being described in a non-archival system.

   We believe such a general statement is necessary because many of the specific rules that follow seem to assume some familiarity with general archival theories and practices. It is extremely unlikely that those consulting RDA for advice on a manuscript will have this familiarly, so there needs to be some reference to the more specific source of the information.

b. **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.

c. 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: "ISAD(G) specifies 26 high-level elements of

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

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). (Adapted from DACS, Levels of Description.)"

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 will add some context necessary to properly implement the specific rules that follow.

d. **RDA 12.1. Title.** It may be helpful to include a few more examples of how to construct titles, particularly for DACS calls "intentionally assembled" collections.

e. There is no rule mandating the recording of the "name of creator" and in what forms (DACS 2.6 and Part II, chapter 9). This is a required, a fundamental element of archival description. Would it be possible for there to be 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)? We realize that creators are covered under Part II and III of RDA, but the narrative description there seems less helpful than a specific rule might be.

f. **RDA 12.9.** We suggest showing an EAD-encoded example, to bolster the idea that this is a data structure-neutral content standard.

g. **RDA 13.3. Dimension.** There is no parallel rule in DACS. In archival practice, this in handled under the extent statement, and the inclusion of a rule here suggests the possibility of item-level description. If this is being included for the needs of another constituency, it might be worth clarifying and stating that, for archival materials, dimensions are typically recorded under the extent element.

h. The committee should consider a rule to describe conditions governing access, i.e. abstract something from DACS rule 4.2.

i. **RDA 14.2.** The term "scope and content" should appear in the title and/or rule.

j. **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

k. **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 in 13.6, so it is unclear why it should also be duplicated here.

l. **RDA 16.2.** "Provenance" is probably the wrong word here, since "provenance" has a more technical meaning that "source of acquisition." This definition was already noted in RDA 11.2.1. "Source of acquisition" is more appropriate.