

# STORE WARS: SOME THOUGHTS ON THE STRATEGY AND TACTICS OF DOCUMENTING SMALL BUSINESSES

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*ABSTRACT:* Most manuscript repositories and even many college and university archives collect the records of American businesses, and the archival literature has given much attention to this subject, but little has been said about documenting *small* businesses. Documentation strategy, as defined by Hackman and Blewett, provides a framework for considering this documentation area. "Small" business has been defined in terms of absolute numbers of employees and absolute dollar values of gross sales, but it may be more logical to define it relatively, within a particular class of business, narrowing the focus of a documentation strategy. "Documentation strategy" founders, both philosophically and practically, when it moves from defining documentation areas to assessing adequacy of existing documentation and advocating the *creation* of documentation.

Should we be documenting small businesses and if so, how? Interesting and, in these days of fascination with (or horror of) multi-billion-dollar mergers and venture capitalists, relevant questions for manuscript repositories. Just as interesting and relevant, perhaps, is how an archivist—at a given institution or generically—can structure his or her approach to answering those questions. This paper experiments with adopting "documentation strategy" as a framework for approaching the questions of whether and how we should be collecting small business records. Documentation strategy, with related terms coined by Larry Hackman and Joan Warnow-Blewett,<sup>1</sup> functions here as a model for "assessment" rather than necessarily for action. This assessment raised as many questions as it answered, both about documenting small businesses in particular and about documentation strategy in general.

Even to raise the possibility of a documentation strategy implies acceptance that the subject (or activity or person) is important and worth documenting. That granted, Hackman and Blewett expect that documentation strategy will take place within the context of a "documentation group," made up of archivists, subject matter specialists, and representatives of users and creators. They do allow, however, that "any of these [people] can define a documentation area and

begin preliminary analysis"; in this case, only a single archivist was "assembled," although he did attempt to gather information from other sources. Once the documentation group (or individual) is assembled, the first step is to define the "documentation area"; in this case to decide just what a small business is. The next step is "documentation strategy drafting," which includes among its considerations the examination of evidence about "present records practices"—how well small businesses have been documented to date—and a look at what the "past, present, and projected uses...of these records" might be. Once the strategy is drafted and refined, they suggest (among other aspects of documentation strategy implementation) intervening in the records-creation process to achieve "adequacy of documentation." So, how does all this apply, potentially, to the world of small business?

Why even worry about small businesses and how well they are documented? There certainly is no question about the importance of documenting "business." Since the 1930s archivists and historians have written over 60 articles citing the need to collect and preserve business records. The overwhelming concern of these authors was that repositories were ill-equipped (in terms of space, staff, and financial resources) to house the vast records of modern "functionally departmentalized" and "decentralized, multidivisional" corporations. Many articles urged the invigoration of corporate archives, others addressed issues of sampling, while still others were general calls for action, reaction, or proaction in the documentation of modern (read *big*) business. Fewer than ten percent of these articles have anything to say about small businesses.<sup>2</sup>

Some of those authors who do look beyond large corporations, however, have made strong cases for the potential use of small business records. Archivist Oliver Wendell Holmes, in the midst of a clarion call for the archival profession to give keen attention to the documentation of American business, paused to note that "there is also much to be learned about economic activity generally from small businesses, perhaps more than from the richer corporations, because, having smaller margins on which to make mistakes, they are more sensitive indicators of business conditions."<sup>3</sup> A decade later, historian Thomas D. Clark focused more intently on the records of small enterprises, arguing that "One of the best single sources for American *social* and economic history is the records of small-town or rural businesses. These institutions have had a vital place in the growth and expansion of the nation." They provide crucial information about the dietary habits, clothing, agricultural practices, and medicinal use of typical American families, Clark argued, as well as about "distribution of goods, of prices and of the intersectional relationships of the national economy."<sup>4</sup>

Today small businesses comprise somewhere between twenty and forty percent of business enterprise in the United States; by sheer numbers, then, it is hard to question the significance of these concerns. Moreover, the continuing importance of small businesses to policy makers and to the economy as a whole is attested to by the very existence of the United States Small Business Administration (USSBA) and by the Bureau of Census's continuing efforts to document the tiniest of enterprises.<sup>5</sup>

To accept that small businesses are important is, though, to beg the question of just what a small business is. Mention "small business" to most people, even to most archivists, and they think of a family-owned-and-operated grocery or hardware store, the kind that still extends credit to regular customers and

employs delivery boys. Such an image is charming and comforting, but also portentous; it carries a host of implications regarding just what a small business is and therefore why and how archivists should preserve evidence of its existence. The trouble is, the icon of the mom and pop corner retail establishment bears something of the same relationship to the actual universe of small businesses as the image of the sodbusting pioneer farmer to the actual universe of commercial agriculture. The family store has existed in various forms in the United States for three hundred years or so and continues to exist today; it is, however, hardly representative of small business. And it cannot therefore provide a sound basis upon which to build a collecting effort.

Defining the documentation area is crucial to the idea of documentation strategy and essential for any collecting policy, but it presents some clear problems in the case of the small business area. Economic historians generally seem to define small businesses (in the post-1880s economic era in the United States) as those with fewer than 100 employees.<sup>6</sup> The U.S. Census Bureau tends implicitly to define small businesses as those employing fewer than 20 people. By this measure there are roughly 140,000 small businesses in Minnesota alone, 85% of the total number of businesses. This 85% of enterprises employs only 25% of the state's business work force. Small businesses exist in every one of 80 major categories (and most of the approximately 500 subcategories) of business types listed by the census.<sup>7</sup>

The USSBA, the government agency most concerned with small businesses, itself balks at the very idea of providing a definition. The USSBA states flatly that "there is no standard size definition of a small business.... The definition used may depend on the policy issue or question being analyzed, or the industry being studied." The only requirement is that a small business cannot be "dominant" in its industry; small, therefore, is relative to the industry giants. For example, as far as the USSBA is concerned, a "small" manufacturer can have up to 1500 employees, depending upon what is being manufactured; a "small" retailer or farmer can have annual receipts of up to \$13.5 million, depending upon what is being sold or grown. (And these definitions do not include the roughly 315,000 people in Minnesota considered self-employed, which is to say, people who operate businesses out of their homes or cars and do not have separate storefronts or manufacturing establishments.) In any event, at \$13.5 million in receipts, mom and pop have got a pretty busy little corner grocery or hardware store. The USSBA sums up by stating that "the definitional issues concerning [small] business owners are...confused."<sup>8</sup> An eloquent understatement, to be sure.

If nobody seems to know just what a small business is, some safe assertions may be made about what a small business is not. All family businesses are not small, but it is equally true that all small businesses are not family-owned. Indeed, a small business is not necessarily *privately* owned. A small business can issue stock, even publicly traded stock, and still be small. On the other hand, a small corporation may still be a family business. Gould P. Coleman notes that "archivists may encounter what amounts to disinformation in the guise of accepted knowledge: articles in the press, for instance, which dramatize the entry of corporations into farming while ignoring the fact that in over ninety per cent of these corporations the stockholders are members of the same family."<sup>9</sup> These family farm corporations are often worth millions of dollars. Are they small businesses?

Which leads to the obvious point that small businesses are *not* just retailers or farmers. In Minnesota there are businesses with fewer than 20 employees in industries as diverse as mining, forestry, carpet manufacturing, corrugated box production, steel milling, manufacturing of construction machinery, chemical wholesaling, banking, hotels, hospitals, and museums, to name a very few. This point is important, lest we implicitly and complacently define small businesses in terms that exclude not simply the bulk of business types but especially some kinds of business owners. For example, many minority-owned small businesses are found not in the traditional small retail trades, but in fields such as electronics assembling, electronics manufacturing, engineering, and information processing, printing, and other service industries.<sup>10</sup>

Finally, to return to an earlier point, small businesses are not necessarily "small" using a layperson's intuitive scale; they are small relative to other businesses in their industry, at least according to the USSBA. To complicate matters further, how does one categorize independently owned and operated franchises of gargantuan restaurant, hardware store, motel, and similar chains? Perhaps the idea of documenting "small businesses" per se is practically meaningless. Is it not more useful to speak of documenting "small retail grocers," "small transportation companies," "small grain mills," "small chemical manufacturers," or "the businesses in small rural towns" as part of a broader effort to adequately document those specific industries or communities? As Hackman and Blewett rightly note, a documentation strategy must begin with a rigorous attempt to define the project's scope. In this case the area of small business may be too amorphous to be embraced in a documentation strategy, perhaps leading usefully to a narrower and more workable scope for a collecting project. On the other hand, it may be that documentation strategy is too amorphous to usefully control and manage a collecting policy, but more on that below.

It is hard to tell whether the difficulty of defining small businesses is a cause or effect of the relative paucity in the archival literature of articles that discuss documenting these enterprises. The implicit assumption of many authors seemed to be either that 1) the records of small businesses, being more manageable in size and more familiar in content, were being taken care of in repositories; or, 2) that in the modern era small businesses were not important for documenting the history of the American economy. As to the first point, there is good evidence to suggest that, despite archivists' preoccupation in the literature with the records of big business over the past 60 years, small businesses were not neglected by repositories. Some of this evidence is in Nick Burckel's 1980 survey of university repositories, which discovered that more than half the respondents collected business records, and most major types of businesses were included. Most respondents, in fact, "indicated that their records reflected small companies—those with fewer than 100 employees. Slightly more reported that most of their records were of privately held companies, as opposed to publicly held, defined as firms issuing publicly traded stock."<sup>11</sup> (To give one example, the University of Kentucky, under the tutelage of professor Thomas Clark, self-consciously built a collection of small business records in the 1940s.) Nor is Burckel's the only evidence that small businesses have not been overlooked in the collecting policies of historical repositories.

At the Minnesota Historical Society, over one-third of the 560 business collections identified in its holdings in 1980 may be reasonably defined as

representing small concerns.<sup>12</sup> The documentation at MHS may be even richer when one considers that the records of large corporations often contain the records of small businesses, either because the corporation began as a little enterprise or because it purchased other companies and acquired their records.<sup>13</sup> Minnesota's regional research centers and county historical societies hold the records of more than 300 other small business firms, according to a 1979 survey.<sup>14</sup> The National Archives, too, documents small businesses. The NARA Great Lakes Region office noted recently that bankruptcy court files often contain final inventories of a firm's material assets, and sometimes also such things as ledgers and cashbooks, annual reports, and board minutes.<sup>15</sup> So, though the effort may not have been conscious, much less "adequate" (in the terms of Hackman and Blewett), there is undoubtedly substantial documentation of small businesses in the nation's historical repositories.

As to the second assumption, how important is the documentation of small businesses? In the terms of documentation strategy, what about the use to which this documentation can or has been put? Are small businesses—despite their numbers—so much at the margin of the U.S. economy that evidence of their activities is of little concern to scholars and policy makers? Clark encouraged archivists to preserve and historians to study the records of "the blacksmith shop, the sawmill, the grist and flour mills, stave and cooperage factories, cotton and woolen mills, distilleries, tobacco factories, blast furnaces, country stores, farm implement, wagon and carriage factories, boat yards, grain elevators, paper mills, metal factories, clock and lock works," and other small enterprises because he was convinced of the utility of those records for historical analysis.<sup>16</sup> Without doing a comprehensive survey of the scholarly literature in economics and history for the past couple of decades it is difficult to determine the extent to which scholars have used small business records, but there is evidence that Clark was not simply a voice in the wilderness. Some authors *have* argued that the economic landscape of the United States since 1890 has been defined by large corporations, rather than by small businesses. Following such reasoning, textbooks and classic monographs in the field of economic history appear in general to give short shrift to small businesses, beyond the obligatory and vague references to "petty capitalists" and "merchants."<sup>17</sup> But based on a survey of 1988-89 journal article titles published by *The Journal of American History's* "Recent Scholarship" section under the heading Business and Economics, eighteen percent of research in the field may touch on post-1880 small business history.<sup>18</sup> The fact that about one-fifth of economic historians do research on small businesses suggests that, even though big business is the dominant player in the modern U.S. economy, there may still be good reason to worry about documenting smaller enterprises—if not generically, then within the context of their industries and/or their communities.

Which reintroduces the questions of definitions and of "adequacy of documentation" for small businesses. Although it may not be sensible to speak of small businesses as if they are a coherent group of firms with some definable similarity, Joanna Yates and Francis Blouin (in separate articles, both following, to some degree, economic historian Alfred D. Chandler) have, however, suggested one unifying characteristic of small businesses: the types of records they generate. In Yates's words:

The small, owner-managed company (usually with fewer than 100 employees) was the standard form of American business enterprise before 1880 and still exists today. In this traditional firm, the owner(s) managed all of the firm's workings.... In a small company of this type, almost all internal communication was handled orally. The owner or foreman collected operating information (such as the production schedule and problems with machinery), made decisions, and gave orders in person.... The accounting records in these small companies served less as communications between individuals than as documentation of financial transactions for future reference. They were simple, descriptive records of monetary transactions....

Internal communication in small firms has changed somewhat in recent times. The variety and, in some cases, amount of such correspondence have undoubtedly declined during this century as long-distance telephone service became universally available and relatively inexpensive.... Because of legal requirements, internal communication or documentation of other types in a modern small business are generally more extensive than in the past.... Communication and records, however, fulfill a relatively limited role in the small, traditional business of both periods.<sup>19</sup>

To some extent, Yates's observation is the refinement of a central archival tenet. Provenance derives from the principle that the records an office creates and the way it organizes them tells us something important about the structure and function of the office. In Lester Cappon's words, "fundamental in this concept of archives is the organic unity of the documents, expressing the life of the organization which created them."<sup>20</sup> In the case of small businesses, Yates argues, the life of the organization is such that few of the records usually regarded as historically substantive are created. At first glance, this typology of businesses presents a problem in terms of documentation. Small businesses generate fewer substantive records because of their particular size, structure, and activity. Therefore, by nature small businesses are more difficult to document traditionally.

From the point of view of documentation strategy, however, this is a challenge rather than a problem. Gould Coleman and Seymour Bassett have both suggested the necessity for archivists to actively enter into creating records to preserve the history of family farms and the tourist industry, respectively.<sup>21</sup> The Minnesota Historical Society has taken up this challenge, to some extent, in its Farm Economy Oral History Project, though for his part Coleman went farther than oral interviews and instituted the use of game theory to study how families made specific decisions. It is integral to Hackman's and Blewett's documentation strategy that archivists be prepared to go beyond oral history or making appraisal decisions early in the record-creation cycle. They suggest "a documentation group should persuade records creators to create certain types of records to meet needs of the group and those of others."<sup>22</sup>

It is possible, however, that archivists may here be faced with a paradox at best, and a serious epistemological quandary at worst. It has been a fundamental axiom of archival administration for at least 70 years that record keeping practices are an organic reflection of the structure and activity of a business. It is, in part, to capture this "evidential value" of records that archives exist. To quote Theodore Schellenberg:

Records that are the product of organic activity have a value that derives from the way they were produced. Since they were created in consequence

of the actions to which they relate, they often contain an unconscious and therefore impartial record of the action. Thus the evidence they contain of the actions they record has a peculiar value. It is the *quality* of this evidence that is our concern here.<sup>23</sup>

Though archivists might gain informational value by strictly following the suggestions of documentation strategy, would we not inevitably destroy evidential value? By asking small businesses to create more or different records are we altering the character of the very phenomenon we seek to document? Is it our business to change what records a business creates—that is, change the fundamental character and structure of its activities—for the righteous purpose of capturing documentation that a panel of experts has decided is important? To put it philosophically, would documentation strategy have us alter the object of our knowledge by trying to know it? And on a practical level, would a small business be *willing* to create additional records for a purpose unrelated to its own profitability?

At the risk of belaboring a point, I think we are a long way from being able to answer such questions—not only for small businesses but for any activity, person, or organization. Documentation strategy speaks of “adequacy of documentation” without giving much attention to what adequacy is supposed to mean. Adequate for whom? For what? (For the needs of the documentation group? But what are those needs and how is the adequate satisfaction of those needs to be measured?) Ultimately, this question goes back to a more fundamental one: What is the ultimate goal of archives? How are we really supposed to measure our success (surely it is not by our rewards from resource allocators alone)? Needless to say, this article is not the place for speculation on answers to these questions; I do think, though, that they deserve some serious attention from our profession’s theorists.

Documentation strategy may offer a useful framework for identifying and approaching some practical questions related to collecting the records of small businesses. It reminds us to begin by asking questions of definition: What is a small business? Is “smallness,” itself, relevant apart from a particular industry? Is it the size of the business that interests us or the form of ownership? It demands that we ask questions about significance: Are modern small businesses important for understanding the economy and if so, at what level? Are small business records useful for purposes *beyond* economic history? And documentation strategy guides us toward important questions about the level of current documentation: How much is out there? Where is it? How good is it? In answering *these* questions—though not, perhaps, the thornier questions about adequacy of documentation and the legitimacy of intervening in the records creation process—a documentation group would be invaluable, *if* any of our archives or repositories have the resources to assemble and direct one. Where are we going to get the money and staff?<sup>24</sup> Well, maybe there is a way. When mom and pop turn enough of a profit on their \$13.5 million gross to leverage a buyout of Joe’s Corner Grocery, split their stock two for one, take advantage of the President’s proposed reduction in capital gains taxes, and endow the Mom and Pop Foundation, we can always submit a grant proposal.

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## NOTES

1. Larry J. Hackman and Joan Warnow-Blewett, "The Documentation Strategy Process: A Model and a Case Study," *American Archivist* 50:1 (Winter 1987): 13-47.
2. The count of articles is based on an excellent unpublished bibliography prepared in 1980 by Dennis Meissner, Minnesota Historical Society. Meissner surveyed both archival and economic history journals. I have brought the bibliography up to date only for *American Archivist* and *Midwestern Archivist*.

Articles that pay any significant attention to small business records are:

Thomas D. Clark, "The Archives of Small Business," *American Archivist* 12:1 (January 1948): 27-35.

T.D. Clark, "Records of Little Businesses as Sources of Social and Economic History," *Bulletin of the Business Historical Society* 19:5 (Nov. 1945): 151-58.

Reynold M. Wik, "Adventures in Business Records: The Vanishing Archives," *American Archivist* 14:3 (July 1951): 195-200, laments the dearth of records for agricultural implement dealers and farm machinery manufacturers.

Jack King, "Collecting Business Records," *American Archivist* 27:3 (July 1964): 387-90, calls for more extensive collecting of the records of small and large businesses.

Christopher Densmore, "Understanding and Using Early Nineteenth Century Account Books," *Midwestern Archivist*: 5:1 (1980): 5-19, focuses on use of existing records of small businesses.

Nicholas Burckel, "Business Archives in a University Setting: Status and Prospect," *College and Research Libraries* 41:3 (May 1980): 227-34, is based on a survey of whether university manuscripts repositories are collecting business records, and if so, what kind.

Seymore Bassett, "Documenting Recreation and Tourism in New England," *American Archivist* 50:4 (Fall 1987): 550-69, is concerned mostly with documenting tourist activity rather than the resorts and small businesses themselves.

Gould P. Coleman, "Documenting Agriculture and Rural Life," *Midwestern Archivist* 12:1 (1987): 21-27, discusses an innovative foray into documentation strategy of family farms.

The quoted terms in this paragraph are from Joanna Yates, "Internal Communications Systems in American Business Structures: A Framework to Aid Appraisal," *American Archivist* 48:2 (Spring 1985): 145, 153.

3. Oliver Wendell Holmes, "The Evaluation and Preservation of Business Archives," *American Archivist* 1:4 (1938): 171-85.
4. Clark, "The Archives of Small Business," 27 (emphasis added); Clark, "Records of Little Businesses," 151.
5. U.S. Census Bureau, "The State—Employees, Payroll, and Establishments by Industry," *County Business Patterns: Minnesota, 1986* (Washington, D.C.: GPO, 1988), 3-14; *The State of Small Business: A Report of the President, Transmitted to Congress 1989* (Washington, D.C.: GPO, 1989). The spread of percentages is due to the problem of definition.
6. Following Harvard economics historian Alfred Chandler, Burckel, "Business Archives," 229, and Yates, "Internal Communications Systems," 144, both use the "fewer than 100 employees" definition of a small business.
7. U.S. Census Bureau, "The State—Employees, Payroll, and Establishments by Industry," *County Business Patterns: Minnesota, 1986* (Washington, D.C.: GPO, 1988), 3-14; Vic Spadaccini, ed., *Minnesota Pocket Data Book, 1985-86* (St. Paul: Minnesota State Planning Agency, 1985), 84.

8. *The State of Small Business: A Report of the President, Transmitted to Congress 1989* (Washington, D.C.: GPO, 1989), 17, 19, 20; telephone conversation 9 April 1990 with George Saumweber, Minneapolis office of the U.S. Small Business Administration. Not to be outdone in confusion, the Policy Analysis Division of the Minnesota Department of Energy (later Trade) and Economic Development changed its criteria for a "very small" business by a factor of ten between 1986 (1986 *Economic Profile of Minnesota*, St. Paul, Minn.: Policy Analysis Division, Minn. Dept. of Energy and Economic Development, [1986], p. 10) and 1988 (*Compare Minnesota: An Economic and Statistical Fact Book*, St. Paul, Minn.: Minn. Dept. of Trade and Economic Development, Policy Analysis Division, 1988, p. 26). In 1986 very small companies were those with less than \$1,000 in gross sales, while in 1988 the same company could have up to \$10,000 in gross sales and still be considered very small. Not surprisingly, the proportion of very small companies in the state jumped from 19.6 percent to 41 percent in two years.
9. Gould P. Coleman, "Documenting Agriculture and Rural Life," 22.
10. *County Business Patterns: Minnesota*, 3-14; National Minority Business Campaign, *Try Us '88: National Minority Business Directory* (Minneapolis: National Minority Business Campaign, 1988).
11. Burckel, "Business Archives," 229.
12. Unpublished "Summary of Manuscripts Collections Survey Results: Business," 15 March 1980. The survey lists 557 business collections, ranging from 5 inches to 15,000 cubic feet, dating from the eighteenth century to the present. Many traditional small family businesses are represented: general stores, small publishers, nurseries, drug stores, furriers, farms, and the like. There are also more modern examples of small businesses: consulting firms, theaters, agricultural cooperatives, and public relations firms.
13. In the Minnesota Historical Society, see, for example, the records of the Great Northern Railroad, T. B. Walker lumber company, and E. J. Longyear mining company.
14. *Historic Resources in Minnesota* (St. Paul: Minnesota Historical Society, 1979), 23.
15. Telephone conversation with Kellee Green, NARA Great Lakes Region office, 11 April 1990.
16. Clark, "The Archives of Small Business," 27; Clark, "Records of Little Businesses," 151. Clark was concerned primarily with nineteenth-century records, but many of his arguments regarding their social and economic history content apply equally to modern small businesses.
17. This admittedly impressionistic survey was based largely on the books assigned to me in two graduate courses, one on U.S. economic history and the other on twentieth-century U.S. history. See, for example, Sidney Ratner, et al, *The Evolution of the American Economy* (New York: Basic Books, 1979), and Samuel P. Hays, *The Response to Industrialism, 1885-1914* (Chicago: University of Chicago Press, 1957).
18. Based on a review of four issues December 1988-September 1989. Much is being written on small businesses in the colonial and ante-bellum periods, but in those years nearly all businesses were small by any modern definition.
19. Yates, "Internal Communications Systems," 144-45. See also Francis Blouin, "A New Perspective on the Appraisal of Business Records: A Review," *American Archivist* 42:3 (July 1979): 316-17. Clark would take issue with the argument that small business documentation is minimal and routine. He points out that some small businessmen became the "official confidants for their communities," and received intimate letters from customers detailing their lives. In addition he argues that the account books themselves, if read properly, are "socio-economic journal[s] of trade" ("Records of Little Businesses," 157), though this is probably less true for modern small businesses. But he does not contravene the general point that small businesses create fewer evidential records, even in proportion to their activity, than do larger firms.
20. Lester J. Cappon, "Historical Manuscripts as Archives: Some Definitions and Their Application," *American Archivist* 19:2 (April 1965): 102. See also Richard C. Berner, "Perspectives on the Record Group Concept," *Georgia Archives* 4:1 (Winter 1976): 50; Hilary Jenkinson, *A Manual of Archive Administration* (Oxford: Clarendon Press, 1922), 1-19; Theodore R. Schellenberg, "Archival Principles of Arrangement," *American Archivist* 24:1 (January 1961): 12-13; and Schellenberg, *Modern Archives: Principles and Techniques* (Chicago: University of Chicago Press, 1956), 11-15, 18.
21. Bassett, "Documenting Recreation and Tourism," 564, suggests task forces of archivists and historians to persuade resort owners to create and preserve better records. Gould Coleman, in a more thoughtful and perceptive article, recounts the use of oral history and game playing to record the history of business decision making by farm families.
22. Hackman and Blewett, "The Documentation Strategy Process," 43; also 27, 24, 23.

23. Schellenberg, "Archival Principles of Arrangement," 12. Frank Boles and Julia Marks Young, "Exploring the Black Box: The Appraisal of University Administrative Records," *American Archivist* 48:2 (Spring 1985): 122-24, have taken issue with the evidential/informational dichotomy of archival value promulgated by Schellenberg. They argue that other values are equally important, but do not abandon (though they rename) evidential value as an important factor in appraisal. Leonard Rapport, "No Grandfather Clause: Reappraising Accessioned Records," *American Archivist* 44:2 (Spring 1981): 143-50, gives a more serious critique of evidential value as an appraisal criterion. Even Rapport, however, does not directly question the importance of evidential value, only the breadth of its application in appraisal decisions.
24. Hackman and Blewett, "The Documentation Strategy Process," 20, as well as other advocates of documentation strategy, argue that no additional archival resources are needed to mount one, even in a small repository. I believe, along with Frank Boles, "Mix Two Parts Interest to One Part Information and Appraise Until Done: Understanding Contemporary Record Selection Process," *American Archivist* 50:3 (Summer 1987): 365-66, that documentation strategy demands an enormous focus of staff time and funds. Although for the past six years every archival conference and every archival journal has included sessions and articles about the documentation strategy theory, I am aware of no more than half a dozen actual documentation strategies that have been put into practice. What can account for this dearth of implementation except an equal dearth of the necessary resources?

For additional critiques of documentation strategy, see the undeservedly ignored commentaries by Frank Boles and Frank G. Burke on Richard J. Cox and Helen W. Samuels, "The Archivist's First Responsibility: A Research Agenda to Improve the Identification and Retention of Records of Enduring Value," *American Archivist* 51:1&2 (Winter and Spring 1988): 28-42, commentaries 43-51. Though each is as intent on championing his own agenda (Boles, refining appraisal methodology; Burke, creating archival theoreticians) as on analyzing documentation strategy on its own terms, each also points to several crucial—and otherwise virtually overlooked—weaknesses in documentation strategy as a practical tool.