



November 26, 2018

The Honorable David S. Ferriero
Archivist of the United States
National Archives and Records Administration
via email to request.schedule@nara.gov

Re: Records Schedules; Availability and Request for Comments (83 FR 45979)
U.S. Department of the Interior Request for Records Disposition Authority (DAA-0048-2015-0003)

Dear Mr. Ferriero,

On behalf of the American Library Association (ALA)¹ and the American Association of Law Libraries (AALL),² we write to provide our comments on the U.S. Department of the Interior's request for records disposition authority (DAA-0048-2015-0003, noticed at 83 FR 45979).

We appreciate the National Archives and Records Administration's (NARA) efforts to strengthen records and information management in order to protect the public's access to government information. Federal records document America's history: the future of an informed republic relies on their effective management and preservation.

As you know, the Interior Department's request has attracted a high level of public attention. We urge NARA to give serious consideration to the comments of subject matter experts as to the adequacy of the proposed retention periods. Although we know that NARA staff make diligent efforts to appraise records' value, we believe that the perspectives of researchers, librarians, and archivists who use the records are also invaluable and warrant NARA's close attention.

Beyond this particular case, the Interior Department's request also highlights recommendations we have previously made to strengthen records management more broadly.³

- ◁ We urge NARA to post all proposed records schedules and appraisal memoranda online for public access when they are noticed in the *Federal Register*, as a NARA advisory committee has recommended.⁴ We are grateful that NARA has stated its plans to do so and we encourage NARA to implement this proactive disclosure as quickly as is feasible.
- ◁ We encourage NARA to continue its efforts to reach out to researchers about the records scheduling process through its blog⁵ and other communications mechanisms.
- ◁ We encourage NARA to consider if it is possible to provide clearer information to the public about the records scheduling process and how to participate, such as by clarifying the content of *Federal Register* no

