



DACS Review (Submitted to SAA, April 28, 2011)

DCRM(MSS) Editorial Team, Bibliographic Standards Committee

Rare Books and Manuscripts Section (RBMS)

Association of College & Research Libraries

American Library Association

## EXECUTIVE SUMMARY

Most of our comments on Part I of DACS have to do with matters of clarity or logic, the need for more examples, and copy edits needed to correct typos and the like. The big question for Parts II and III, of course, is whether RDA will be implemented, and how widely. The revisers of DACS will have to decide whether to base Parts II and III exclusively on RDA or to provide alternative rules for RDA and AACR2. We also recommend that there be some mention of relevant DCRM (*Descriptive Cataloging of Rare Materials*) modules for item-level description of manuscripts and of non-manuscript material that, because of its bibliographic or historic significance, warrants a more detailed description than is provided for by AACR2/RDA. DCRM(MSS) is under development as a standard intended to supersede APPM as a guide to the description of individual modern manuscripts, while AMREMM is a published standard for the description of medieval, Renaissance, and early modern manuscripts. Other formats are covered by: DCRM(B) for books, DCRM(S) for serials, DCRM(G) for graphics, DCRM(M) for music, and DCRM(C) for cartographic material (the last three are still under development). (For more information on these developing cataloging standards, see the RBMS Bibliographic Standards Committee home page: [http://rbms.info/committees/bibliographic\\_standards /index.shtml](http://rbms.info/committees/bibliographic_standards/index.shtml))

## Preface

p. v “Archival descriptions in an online environment, where not only researchers but other archivists can see them, have highlighted differences and similarities in practice between repositories and brought to the fore the need for a content standard for finding aids.”

**Comment:** And yet there are still vast differences. Some of this is because of the types of materials that are being described: government records, personal papers, corporate records and valuable single items. While DACS has helped to bring archival practices more into line with each other, they are still too variable. Part of this has to do with the fact that while DACS is a content standard, many of the rules still basically state, “Do whatever is best for your institution.” As Margaret Nichols stated in her talk at RBMS in Philadelphia, archivists are less rule-bound than rare book catalogers. There doesn’t seem to be any reason why they couldn’t standardize their descriptive practices more. Admittedly archival and manuscript collections are not all the same, and do not have a nice neat package like a book or a DVD, but there are still many similarities between collections as a whole. With the advent of MPLP (Greene and Meissner’s recommended accelerated method of archival processing, based on a focus on “more product, less process”), it seems that standards with hard and fast rules are more important than ever, because when you have these rules it makes it easier to get down to the business of description. Of course the real question is, Do these differences in how information is disseminated make it more difficult for the users of these materials to find what they are looking for or not?

## p. vi Relationship to other Standards

**Comment:** We suggest the addition of RDA as well as AMREMM and DCRM(MSS), as well as the whole DCRM suite, as each has an appendix on collections. Repositories with large graphics collections may turn to DCRM(G) instead of DACS, and DCRM(M) (for music) and DCRM(C) (for cartographic materials) will cover manuscript versions of their materials. While the standards for DCRM (MSS, G, M, and C) are not published yet, graphics should be in the coming year and manuscripts we hope to the year or two following that. Mention the DCRM suite and that there are standards in the works for graphic materials to replace *Graphic Materials: Rules for Describing Original Items and Historical Collections*, in the works for single item manuscripts, and in the works for maps (cartographic materials) and music both including rules for original manuscript materials as well as published/printed.

After looking at the ISAD(G) 26 Data elements, DACS layout makes more sense than it did when it first came out, as it was so different from AACR2 and APPM in layout.

**p. vii** “DACS simply omits areas mentioned in APPM that have little or no relevance to the description of archival materials, such as bibliographic series, parallel titles, statements of responsibility, etc.”

**Comment:** DCRM(MSS) will be adding some of this, especially Statement of Responsibility and at least basic rules for formulating formal titles, since DACS does not cover this at all, but it does come up more frequently when describing at the item level.

**p. viii** “Artificial” collections – “Most repositories in the U.S. have such collections, and they need to be handled and described the same way as materials traditionally considered to be 'organic.'”

**Comment:** True. The only problem with this notion is that many archivists still refer to them as artificial collections. At the very least these should at least be described as something, as there are some things that would be dealt with differently. And what do we call them if not artificial? Repository collections? For example The Bancroft Library collects materials on George Sterling. Some are collections created by others, while another collection was created and added to over the years from many different sources one or a few manuscripts at a time, usually purchased from dealers; it's an artificial collection. How these get described and arranged may be slightly different. In DACS there are separate rules for titles for these types of “organic collections” in 2.3.22, and it would be nice to have a name to call them. “Artificial” seems to fit best, as a repository as collector is a little more artificial than an individual, who does not follow the same sort of archival practices as a repository would. A repository is not likely to put the collection in a scrapbook or make comments on the items, and is more likely to impose an order on this collection once items come in.

**p. viii** “DACS contains no specific rules for the description of particular media, e.g., sound recordings, maps, photographs, etc.”

**Comment:** Need to add that DACS also does not contain specific rules for the description of single items and that the reader should go to AMREMM for medieval, Renaissance and early modern and to DCRM(MSS) for modern manuscripts, as rules for collections are going to be too broad for the description of individual items. While archives are heading towards MPLP (“more product, less process”), there are still instances when an institution is going to want to describe items more at an individual

level because of monetary and/or research value, or because the item is a stand-alone item.

### *Statement of Principles*

**Principle 1: Records in archives possess unique characteristics.** “They most often consist of aggregations of documents (largely unpublished) and are managed as such, though archival institutions frequently hold discrete items that must also be treated consistently within the institution's descriptive system.”

**Comment:** Since detailed rules for “discrete items” are not found here, DACS could add: “While these rules can be used to describe discrete items, the cataloger may wish to use another standard to more closely fit the type of material(s) being described, or to describe the item in more depth.” A footnote could refer the reader to DCRM(MSS) for guidance.

**Principle 2: The principle of *respect des fonds* is the basis of archival arrangement and description.**

**Comment:** It needs to be mentioned here that while one must practice *respect des fonds*/original order, many collections do not have this as such. Admittedly here is not the place to go into this too much, but it does need to be acknowledged that personal papers especially, but even the records of organizations, corporations and government bodies, are not always going to have an original order, and that sometimes the description (if not the arrangement) may put things into a more logical/usable order. If we really did follow original order all of the time, there would be no arrangement; it would be unnecessary. Obviously with MPLP there is less of this but ... of course this is sort of covered in Principle 3.

**Principle 4: Description reflects arrangement.** “Archival repositories must be able to describe holdings ranging from thousands of linear feet to a single item.” “A single item may be described in minute detail, whether or not it is part of a larger body of material.”

**Comment:** But DACS does not give any rules for the single item. Catalogers can use AACR2 for non-manuscript items; for individual manuscripts, it would be helpful to mention here that APPM is still the best (only?) guide to the description of individual manuscripts, until the publication of its intended replacement, DCRM(MSS).

**Principle 5: The rules of description apply to all archival materials regardless of form or medium.**

**Comment:** There are other rules to describe collections of materials in just one form of medium. For example DCRM(B) has an appendix on how to deal with print collections, as do (S), (G), and possibly (M) and (C), as well as CCO for objects.

**Principle 7:** use of word “elucidation” in the last sentence: while this may be the proper word, could use a different word or phrase. Perhaps: This requires a [clarifying explanation] regarding the order in which such information is presented and the relationships between description(s) of the parts and the description of the whole. Or replace with “more thorough clarification or explanation.”

**Principle 7.3: Information provided at each level of description must be appropriate to that level.** “Information that is common to the component parts should be provided at the highest appropriate level” and the idea that information does not need to be repeated.

**Comment:** One problem with not repeating some information is that sometimes users find themselves in a finding aid online or even a large MARC catalog record and have lost their place and the relevance of what they are looking at. Something as simple as the call number (shelfmark or other unique ID) and box number is all that is needed to place the folder. Sometimes this can be solved with a style sheet or other way electronically. In paper finding aids, often the title of the collection along with the call number is repeated at the top of each page. Of course this needs to be balanced with the fact that everything at each level should not have or need the same long information repeated over and over.

**Principle 8: Creators**

**Comment:** While creators need to be described, this information can point outside of the description, either with the EAC, Library of Congress Name Authority Records, websites, printed biographies or even an item in the collection itself. Biog/Hists can sometimes get to be long, and in the days of MPLP it makes sense to give just enough information to identify the person/organization and perhaps to put the collection into context.

It might also be important to point out here that this is not the place to make judgments about the people or organizations; it really needs to be just the facts.

Also: "The repository as collector does not need to be described."

**Comment:** While this is true, it might be important to note when, why, and how the repository started the particular collection. It can be covered in other elements, but this history is important to include if known.

*Overview of Archival Description, p. xvii*

"DACs is a standard that is independent of particular forms of output in given information systems, such as manual and electronic catalogs, databases, and other finding aid formats." Will be used with "two most commonly employed forms"

**Comment:** This does not state explicitly what these two are. While it is obvious, it needs to be stated for the benefit of novice archivists: MARC and EAD. They are mentioned in the next paragraph, but why wait so long to mention them? Change wording from "... two most commonly employed forms ..." to "currently two most commonly employed forms of access tools, catalogs and inventories (MARC21 and EAD) ..." Add "currently" as there may be a replacement to MARC21 coming in the near future because of RDA.

**Access points, p. xviii**

Mention that access points should be given context in the description. There needs to be warrant for the access point.

p. xix at top of page

**Access points fall into 6 broad categories:**

**Names** – See comment below about changing

**Places** – See comment below about changing

**Subjects** – Below where it is described it has the heading Topical Subjects, which is what it should be here; also note that all of these 6 broad categories can be subjects.

**Documentary forms** – See comment below about changing

**Occupations**

**Functions** – Below where it is described it has the heading Functions and Activities, which is what it should be here

**Names:** creator or subject of the records.

**Comment:** Maybe point the reader to 2.6 for a broader definition of creator, since this term seems to encompass more than just the creator of the records but also the collector, photographer, editor, etc.

“At minimum, an access point should be made for every name included in the Name of Creator(s) Element in a single-level description, or at the highest level in a multilevel description.” There needs to be a provision that if the number of names becomes too numerous, the institution can decide to create access points only for the most prominent creators. There should also be a provision that if the list of creators includes a group of people of equal prominence, but they are also known collectively by a particular name, it is OK to use only the collective Corporate/Organization name.

“Part III provides directions ...” perhaps the text should mention here that these rules come straight from AACR2 (Or if they are going to be changed to RDA then that they come from there).

Many people have also been confused as to how much of the name needs to be used when it is mentioned within the description. DACS could state here that if the full authorized form with dates and fuller forms of names is mentioned at the top level, it is not necessary to repeat all this information further in the description, unless there are conflicts that need to be resolved, i.e. two or more people with the same name within a description.

Also, this might not be the place to cover it, but maybe this only needs to apply to names that are in the front matter of a finding aid, not further down in a contents list. While it is important to be internally consistent (or institutionally consistent) with names, it is not as important to be consistent with every minor name listed, as this can be time consuming.

## **Places**

**Comment:** Perhaps this should be “Geographic Place” names, not just places.

Coming from the Name of Creator and Admin/Bio, a Places access point is not always appropriate for inclusion. Just because someone is from somewhere does not mean that the materials tell someone anything about this place. There needs to be language that states that a geographic heading is not always appropriate for some collections.

Chapter 13 is straight from AACR2, and that should be mentioned here. Or at least state that the LCSH headings are based on AACR2 chapter 2X.

**Topical Subjects:** "The topical subject matter to which the records pertain is among the most important aspects of the archival materials"

**Comment:** While this is true in many cases, sometimes the only subject available or appropriate is a name or place and not a topical subject. This might be because there is no one strong topical subject or there just really are none that fit.

Mention local institutional devised subjects. While LCSH covers a wide variety of subjects, sometimes they are not specific enough for some collections. Also add that it is important to keep track of these locally devised subject headings in an authority file.

### **Documentary Forms**

**Comment:** Is this really the best term? Perhaps "Form and Genre," or is this too booky?

Point the reader again to Appendix B for Thesauri. Add RBMS Form/Genre forms to Appendix B. Not appropriate for many types of archival collections, but can be for manuscript collections.

### **Occupations**

**Comment:** Pulling this out seems odd, as this is a type of a topical subject.

### **Functions and Activities:**

**Comment:** Again, aren't these just a type of topical subject?

## **PART I Describing Archival Materials**

### *Introduction to Describing Archival Materials, p. 3*

#### **Purpose and Scope**

**Comment:** paragraph 1, “discrete items”: These rules do not really cover what to do with these items, as the rules cover collections very well but not individual items. Of course then it goes on to state in the next paragraph that these rules really don't apply to these. Or are discrete items not item level? Appendix B needs updating with mention of DCRM(G), DCRM(C), DCRM(MSS), and AMREMM.

#### **Options and Alternatives**

**Comment:** Does the distinction between optional and alternative rules follow the same pattern as in the DCRM series? It would make it easier for those who have to use a variety of standards to describe their materials if the same pattern were applied in both (as it probably is). In DCRM, 'Alternative rule' designates an alternative option that affects all or several areas of the description, and that must be used consistently throughout; 'Optionally' introduces an alternative treatment of a single element."

**Examples, p. 5:** There is a footnote to EAD, but should there be a footnote to MARC as well, for those unfamiliar with it? Also may want to note that a specific attribute may not be required in some cases for EAD. Suggest adding footnote [18] at end of last paragraph: “See *MARC 21 Format for Bibliographic Data* for more specifics on the use of the various fields, subfields and indicators that may not be mentioned in examples here.”

### *Chapter 1. Levels of Description, p. 7*

**Comment:** End of 2<sup>nd</sup> paragraph “or at multiple levels that have a whole-part relationship” Not sure whole-part is the best phrase here. Possibly change to “or at multiple levels that have collection and part relationship, “ or “at multiple levels that have parent, child and/or sibling relationships.”

**Comment:** In the age of MPLP, should the minimum level be defined in keeping with MPLP needs?

Looking at the three levels, the Optimum and Added Value levels could be combined, since the instructions in Added Value don't really give much instruction except to add other elements the repository wishes to include.

### **Single-level descriptions**

**Comment:** Would a straight box list in an EAD finding aid, not specifying different levels, not be also a single-level description? Or is it considered a two-level description, with the front matter being the top level and the contents being the second level?

### **Single-level minimum**

**Comment:** not sure even a scope and content element is needed if the title says it all, especially for single items or for collections with only one type of material. Also, in the time of MPLP, it might be omitted for smaller collections in general. Example: "**Frank Revada wanted poster : Mono County, Calif., 1892.**" (Bancroft Library BANC MSS 2007/7) While this record does have a scope and content note, at the minimum this title says it all. Or "**Will of Henry Carey, 1757 September 30.**" (Folger MS Z.c.44 (7)). Or "**Letters on John Johnston's marriage, 1948.**" (WHS File 1948 April 30).

### **Single-level minimum: Conditions governing access element**

**Comment:** Rule 4.1.5 instructs, "If there are no restrictions, state that fact." We are not sure this element should be required at the minimum level if there are no restrictions. One of us has worked at three different institutions and has yet to see this implemented as a required minimum (except in the finding aids, which are not this level). At public institutions, records are assumed to be available unless stated otherwise, since the records are public property (e.g. Wisconsin Historical Society and Bancroft Library). At private institutions, usually the restriction is **on being admitted as a researcher** (Folger and Morgan).

Instead of "If there are no restrictions, state that fact," we suggest: "Include this element when the access restrictions differ from the norm of the institution," or "If there are no restrictions, optionally omit this element."

### **Multilevel-Minimum**

**Comment:** Not sure what "Identification of the whole-part relationship of the top level to at least the next subsequent level in the multilevel description" means. First replace

whole-part relationship with parent, child and/or sibling relationship? Can this be done with a sidebar table of contents in an online finding aid, or a table of contents in a paper finding aid? Or are we talking about a system of arrangement element (3.2)? If yes, then why not state that here.

### **Each subsequent level of a multilevel description**

**Comment:** Do you want to state that this could be as little as the extent (container) and date?

### **Single-Level Minimum and Multilevel-Minimum: Scope and Content as Abstract**

**Comment:** Almost every repository calls a shorter scope and content note an abstract, and the longer, more narrative one a scope and content note. The fact that it is not called this upfront in DACS is a little confusing, since the phrase “scope and content note” appears again in the Optimum levels. Of course this is explained in the narrative after this. (Also see general comment to 3.1)

Again, the Added Value level may not be necessary, since this doesn't really add any value here. It just basically suggests, “Add whatever else you wish,” and this could just be added to the Optimum level.

Also, nothing needs to be stated about “each subsequent level” unless you include adding a scope and content note or other general notes about that specific item or series. So a particular series might need a physical or technical access note. Even if stated at a higher level, it should be stated again at the level of the access if it is different from most of the rest of the collection.

## ***Chapter 2. Identity Elements, p. 13***

### **2.1 Reference Code**

**Comment on 2.1.3:** Any way to suggest optionally to have this information always display on the screen and/or page (paper finding aid)? It is always confusing to have to scroll back up or click away from when in a long contents list. Many new users have come to the desk requesting Box 23, Folder 5, not knowing they need more information than that. Part of this is a matter of educating users, but to have the most important information for accessing a collection buried is not very user friendly. There is a way to

have style sheets always display this information. This is less of an issue with catalog records, as they are never as long as EAD finding aids can be.

**Footnote 20** “The MARC Code List for Countries is used in archival cataloging (e.g. mixed materials) to indicate the country of the repository in the 008 field.”

**Comment:** We assume this refers to the MARC field “008 15-17 - Place of publication, production, or execution.” In that case this is NOT the correct usage of this field, although historically archival collections have used this field in this way. From MARC 21 Bibliographic online “Choice of a MARC code is generally related to information in field 260 (Publication, Distribution, etc. (Imprint)).” But when using MX format “For **mixed materials**, the code represents the repository where the material is assembled.”

But then “p - Mixed materials [is] used when there are significant materials in two or more forms that are usually related by virtue of their having been accumulated by or about a person or body. Includes archival fonds and manuscript collections of mixed forms of materials, such as text, photographs, and sound recordings.”

(<http://www.loc.gov/marc/bibliographic/bdleader.html>) Not all archival collections are in two or more forms, so some collections (or single items, which by the virtue of being single can't be two or more forms) are cataloged in the Book format with the Type: t manuscript language material, with Type of control: a archival.

Thus, the use of MARC 008 15-17 to denote the location of the repository really only applies in the mixed format, so only for archival collections that are of more than one type. And some institutions do not use “mixed material” when the other forms found in the collection are not significant.

If the mixed material definition of MARC 008 15-17 were applied to the literary manuscripts of John Clifford Mortimer (Bancroft Library BANC MSS 89/62), the collection would be coded cau, which is misleading as most of his work was done in Britain and he never lived in California, but only visited it.

## 2.2 Name and Location of Repository Element

**Comment:** Might it be desirable to also add instructions to add a hyperlink to the repository home page or contact information page? This is especially useful in cases where the finding aids are found in a consortium like Online Archive of California (OAC) or on Archive-Grid.

## 2.3 Title element

**Comment:** Suggest changing it from “supplied title” to “devised title.” Looking up definitions of “supply” and “devise,” “devise” really fits better into what is being done. Historically this is what archivists as well as librarians have called our titles. The DCRM series of cataloging manuals has switched to “devise” for titles composed by the cataloging agency; it uses “supplied” to describe a title transcribed from an external source. That external source is usually a reference source.

The second part of the title might not be descriptive enough. “The nature of the materials being described” could actually be the form of the materials or the subject of the materials. Perhaps reword to: Devised titles generally have two of the following three parts:

the name of the creator(s), collector(s), compiler(s), etc.

the format of the materials being described

the subject of the materials being described

### 2.3.2

**Comment:** Consider adding a reference to the DCRM suite of cataloging manuals, which are intended for individual manuscripts or for rare materials in other formats, such as graphics, music books, cartographic material, and serials.

### 2.3.3

**Comment:** consider changing “a term indicating the nature of the unit being described, and optionally a topical segment ...” to “a term indicating the format of the materials being described and optionally a topical subject segment”

**“Do not enclose supplied titles in square brackets”**

**Comment:** replace supplied with devised and think about adding a footnote stating the reason for not enclosing in square brackets, since most titles for archival and manuscript collections are devised, so putting in square brackets does not help...

## Footnote 22

**Comment:** The order of these elements is not prescribed, yet almost all of the examples have the titles as Creator, nature (format), topical (subject) and not in any other order.

2.3.5. "Record the name(s) in the form by which the creator or collector is generally known."

**Comment:** Look at Chapter 12, but it can be misleading to list a form of the name by how the creator is generally known if the collection is for only when the person was known by a past name and not a more current name. For example : an institution has a collection of Cat Stevens manuscripts but none of his manuscripts by his current name Yusuf Islam. It would be misleading to call it the Yusuf Islam papers when the repository doesn't have anything by him under that name. Perhaps the rule should read "Record the name(s) in the form by which the creator or collector is generally known, or the form that he used at the time of production of the materials held, or the latest form used by him in the materials held."

**"The name may be abbreviated if a fuller form of the name appears elsewhere in the descriptive record (e.g., in the administrative/biographical history) or as an access point."**

**Comment:** This is OK within a contents list, but to use an abbreviated form in the title of the collection as a whole, if it is not the form by which the creator is generally known, is misleading. Perhaps this rule should be "The name may be abbreviated if a fuller form of the name appears at a higher level in the descriptive record."

Do we want rules on how to differentiate two people with the same name in the title by adding other information such as dates or other descriptive points?

No instructions on what to do for people with titles, suffix, etc., which may not be included in their authority records but are important to distinguish them from people with similar names.

Bishop Roy C. Nichols papers

### **Footnote 23**

**Comment:** Why can no more than one corporate name appear in a title? Sometimes there are collections where two distinct companies come together to make one company, but the collection does not include any records of the company as a whole, or where the creator was initially one corporation and then was split into two distinct corporations. If there is a particular rationale for using only one corporate name in the title, could it be explained in a footnote?

#### **2.3.9**

**Comment:** consider doing what DCRM is doing, which is listing a few (usually 3) and then adding "... and 5 others." And then in a note you can list the 5 others.

#### **2.3.10**

**Comment:** Spellings used by genealogists and LCSH are not always preferable. The title should use the form of name most commonly used by the family group represented in the documents, preferring later spellings (as represented in the collection) over earlier ones. The main entry may be the LCSH spelling, but an added entry with the family's spelling may be added (not sure if this information about access points belongs here or elsewhere). RDA instructions for forming names will be a bit better, so perhaps follow those.

**2.3.15:** see comment on 2.3.9.

#### **2.3.16 More than one corporate body**

Example:

Momo's Press records

NOT

Momo's Press and Shocks magazine records (Bancroft BANC MSS 97/41)

Note: Momo's Press published Shocks.

### 2.3.18

**Comment:** "... used by a government agency or private organization ..." possibly switch to "... used by a corporate body such as a government agency or private organization such as a business or club ..." There needs to be the word "corporate" in here somewhere, as this is how these entities are referred to elsewhere in the archival and library communities.

**"When describing an intentionally assembled collection, supply the word 'collection' to indicate the nature of the unit being described"**

**Comment:** These include "artificial collections." Maybe want the note here to include collections assembled by the parent institution. Or tell the reader to look at 2.3.22.

Add an example, like the use of "collection" and "papers" in titles:

Collection of Bob and Eileen Kaufman papers, circa 1959-1996. (Bancroft BANC MSS 2007/159)

University of California, Berkeley, University Art Museum collection of Hans Hofmann papers (Bancroft BANC MSS 80/27)

### 2.3.19 Example: Andrew Jackson letter

**Comment:** This title is not helpful at all (admittedly have not gotten to dates yet, which would help narrow down this title, and DCRM(MSS) will give instructions on how to deal with single items)

**Footnote 26:** point people to form/genre lists such as AAT and RBMS?

### 2.3.21

**Comment:** We suggest breaking out a section on what to do when the creator is unknown.

Poem : by a daughter, whose father dies in California by that dreadful scourge, the cholera (BANC MSS 2006/24)

## Civil war correspondence

Another thing that would be helpful to cover here that will not be covered in DCRM(MSS) is when a title appears within the title. Sometimes a collection is an author's research files for a later publication, and that information is important to have in the title. For instance, "David T. Wellman interviews" could be misleading if there are other separate collections of David T. Wellman interviews for other works. Instead, use the title David T. Wellman interviews for Portraits of white racism. Instruct to capitalize the second title according to cataloging rules for books.

### **Example for encoding 245 10 William Dickson Pearsall \$k letter, \$f 1892**

**Comment:** While the example is technically OK, it is also OK to code the title as 245 10 William Dickson Peasall letter, \$f 1892

**General Comment on 2.3:** No instructions on what to do when the collection combines both corporate and family/individual's papers. Can both go into the title? If not, which takes precedence? Records or papers?

For example: Atkinson family and Atkinson Construction Company records (BANC MSS 2007/204)

## **2.4 Date element**

### **Date(s) of record-keeping activity**

**Comment:** related to this would be date(s) of compilation, for example a scrapbook of materials that predate the creation such as J.O. Halliwell-Phillipps (See Folger collections) who collected items related to Shakespeare and put them into scrapbooks. Some of these documents were from Shakespeare's time (or before) to Halliwell-Phillipps' time. For example: J.O. Halliwell-Phillipps collection of documents relating to Stratford on Avon, ca. 1270-ca. 1700 [manuscript], compiled 19th century (Folger MS Z.e.9). The statement was made before in the Date(s) of Creation element: "This is the type of date recorded most often by archivists and manuscript catalogers not describing government or organizational records." While this is true, it seems to exclude the type of document described above. Besides, one wouldn't necessarily describe the compiling efforts of a collector as record-keeping activity.

## **Date(s) of publication**

**Comment:** It is a little unclear as to why this is here, unless the item in question is being described in a contents list. If it is being described individually in a catalog record, then one would follow the rules appropriate to that material.

**2.4.1:** "If the material being described is a reproduction, record the details about the reproduction, including the date(s) of reproduction, if known, in the Scope and Content Element (3.1.7)."

**Comment:** If this date is buried in the Scope and Content element, it is misleading to the person who is looking at this description. It should really be part of the date element, for many people just scan titles and dates, and if this information is buried in the scope and content note they will not realize their error until they see the item.

For example: Unknown soldier's Civil War diary, 1861-1864. (WHS File 1861 September 4)

Summary: A typewritten copy of a diary of Civil War experiences by an unnamed soldier whose parents lived in Manitowoc, Wis. The diary relates the soldier's experiences, apparently as an engineer or sapper, in Kentucky, Mississippi (especially at Vicksburg), and Tennessee. The writer's identity or unit cannot be identified with any certainty, although he may have been part of a Missouri regiment.

When a search is done on Civil War diaries, the list shows just the dates of the original compilation and not the date of the copy. (Of course these rules are covered in DCRM(MSS))

Rather this would be more helpful: Unknown soldier's Civil War diary, 1861-1864, typewritten copy, 20<sup>th</sup> century.

We do agree with the second part of the exclusions about copies available elsewhere.

### **2.4.3**

**Comment:** add dates of compilation? See comment above about dates of record keeping activity.

#### 2.4.4

**Comment:** Suggest changing “When recording multiple date types, explain each in the Scope and Content Element (3.1)” to explain each in a note. In some cases this information might be better served in a general note than in the scope and content note. Or perhaps “explain each in a general note (7.1) or in the Scope and Content Element (3.1).”

**Footnote 27:** “MARC based systems will allow only one date type,”

**Comment:** this is not entirely true. In the fixed fields the date can be recorded as date of reproduction and date of original, and in the title element the creation dates can become part of the devised title, while the dates of reproduction could go into the 245 \$f or 260 \$c.

#### 2.4.5

**Comment:** DACS could point people to DCRM(MSS) on how to deal with these different types of dates rather than AACR2.

#### 2.4.8

**Comment:** This rule is excellent, so much more helpful than its APPM counterpart. But there should be an option to add a note about how frequently more materials come in, and the reader should be referred to Chapter 7 on notes.

#### 2.4.9

**General Comment:** do we want rules to give exact starting and ending dates such as for a diary or account book? 1861 April 25-1863 March 5

#### 2.4.15

**Comment:** Would be nice to have an example for century: 1900s or 20<sup>th</sup> century? Or is there no preference, just as long as the repository’s practice is internally consistent?

What about dates where the exact year is unknown but the rest has been supplied on the item, such as June 2, 189\_?

What about when only month and/or day is known but not year? Better to express a circa/approximate year with or without the month and day?

#### 2.4.15 and 2.4.16

**Comment:** It would be good to at least have some language stating that especially at the collection level, it is important to at least supply an estimated century date, whereas further in a contents list it would/could be more acceptable to record “undated,” especially if it is believed that the item falls within the collection dates or series dates or if it would be misleading to supply a date. Otherwise, if it is believed to fall outside the dates of the other materials in the collection, the reader should be strongly encouraged to supply some date.

#### Footnote 31

**Comment:** expression of dates as all numerals is discouraged ... although in the encoding in EAD it may be, while in the display it is not. For example “<unitdate normal”19060317”>1906 March 17</unitdate>

**Examples:** 245 10 \$a Wallis H. Warner papers, \$f 1884-1964, \$g bulk 1920-1963.

**Comment:** Typically this would be \$f 1884-1964 \$g (bulk 1920-1963) (see APPM 1.1B5 example at bottom of p. 15). No comma after \$f dates, and parentheses around bulk dates.

#### 2.5 Extent Element

**Purpose and scope:** “If the description of particular media or individual items requires more detail ... see specific chapters in AACR2 or the medium specific rules indicated in the Introduction to Part I and Appendix B.”

**Comment:** Since AACR2 is on the way out, why not name DCRM series here?

**Examples p. 32:**

**Comment:** All of the MARC examples put the term of measurement or material in the \$f, but it is perfectly acceptable to have it without. See <http://www.loc.gov/marc/bibliographic/bd300.html>

## 2.6 Name of Creator(s) Element

**Comments:** The reader needs instructions here on what to do when there are more than one.

Need to state here that when the housing repository is the creator of an intentionally assembled collection that there may not be (or will not be) a creator element, although there may be subject access to personal, family and corporate names or additional access to associated names such as former owners, authors of specific parts of the collection, etc.

Need instructions on what to do when the creator is unknown, known by a first name or by initials.

**Another comment:** DACS refers here and elsewhere to identifying the roles played by persons, families, or corporate bodies vis-à-vis the resource. As far as we can see, the only place the role is explicitly identified is in the Administrative/Biographical area. Would DACS consider offering guidelines on including role information in access points, as relator terms (MARC subfield \$e), e.g.

Smith, John, \$e collector

Smith, John, \$e cartographer (for an archival collection of maps)

Smith, John, \$e former owner

## 2.7. Administrative/Biographical History Element

**Comment:** This section appears to combine two separate things. One is the history of the materials themselves, the provenance and the accession by the holding institution, and then the other is the history of the people, family or corporation/organization(s) whose papers they are. In other words, this section covers both administrative history <acqinfo> and <custodhist>, or 541 and 561, *and* Biographical/Organizational History <bioghist> or 545. And there is not much insight on either of these. On the other hand, this does match ISAD(G) 3.2.2; we had this confused with 5.1 Custodial History. Perhaps the phrase “Administrative history” is misleading.

### *Chapter 3 (Content and Structure Elements)*

**3.1. General note:** If we can't distinguish between scope and content, why are we still calling it "scope and content"? Also, are there separate elements for Scope and Content and Abstracts? No, yet they are talked about and treated as two distinct things. Yet they are similar and many times the same thing.

**3.1.** "to judge its potential relevance" to what?

**3.1.4:** penultimate and last examples are for items (plat map and letter). The next version of DACS could have a note here to refer people to the appropriate standard for item level cataloging (e.g. DCRM(MSS) for individual manuscripts, AACR2 or DCRM(C) for cataloging cartographic material), should the cataloger have a desire to do so.

**3.2:** Somewhere, this needs to at least mention the concept "series." All of the examples assume the use of series and subseries, yet the rules speak only of "aggregations."

### *Chapter 4 (Conditions of Access and Use Elements)*

**4.2.5.** Examples are unclear. Because there is no mention of limited access or restricted use in the condition description, it is not clear to the reader what this element is doing except describing the physical condition of the materials, not access to the materials (seems to create confusion between access to the intellectual content and access to the physical item).

**4.4.9:** should read: "If the materials being described are known to be protected by copyright..."

**4.6.2** should specify that the completeness, or incompleteness, of the finding aid should always be mentioned.

#### **4.6.5. Published Descriptions**

**Comment:** How about providing an example of MARC coding for a citation to a description published in standard lists, e.g.

510 \$a Ricci. Census, \$c vol.1, p. 857, no. 4

510 \$a Babson Collection. Newton (suppl.), 417.725

## *Chapter 5 (Acquisition and Appraisal Elements)*

### **5.1 Custodial history**

**Comment:** This section is unclear. It probably should read “from the time it left the possession of the creator until the time it came into the possession of the owner from whom the repository received it.” That may sound confusing, but it is equally confusing to have the definition of the element read: “from the time it left the possession of the creator until it was acquired by the repository” and then to have the following rule exclude the source from which it was acquired by the repository.

**Another comment:** This section should mention or give guidance on what to do with a single collection with multiple provenances for different parts of the collection. These are mainly artificial collections/collections of materials brought together from different sources by a repository.

**5.1.2:** Need more examples of source of information for this element.

### **5.2. Immediate Source of Acquisition Element**

**Comment:** There is no mention here of former accession or inventory numbers. Former numbers are very useful identifiers for individual manuscripts (which are often identified primarily by their inventory numbers), in cases where a manuscript has been transferred to another repository, or the accession number assigned by the repository changes. This might not apply to larger groups of material, but it might. Maybe they could be covered under:

**7.1.6.** “If appropriate at the [file](#) or [item](#) level of [description](#), make a note of any important numbers borne by the unit being described.”

Although “borne” suggests they appear on the item, which may not be the case. “Borne by or formerly assigned to” might do it.

**5.3.** Strike “about the rationale for”; actually this is 5.2.4

5.3. First sentence of "commentary" should be edited to read "Not all materials offered to, or acquired by, a repository MERIT permanent retention" (not merits)

5.4. Strike second sentence ("An accrual is..."). This is glossary material, and the definition in the glossary differs slightly.

### *Chapter 6 (Related Materials Elements)*

6.2.3.: Dead link in the 4th example. Is it this instead:

<http://www.mnhs.org/library/Christie/intropage.html>

**Examples:** Should the 1st MARC example read: 530 bb \$3 Diaries \$a available on microfilm for use in repository only.

6.3.5.: Uncertain about the last example, "Motion picture films and sound and video recordings transferred to Library of Congress Motion Picture, Broadcasting and Recorded Sound Division." From the description, it sounds like this has the same provenance as the rest of the collection, but the MARC encoded example gives 544 bb so we're not sure. Does this example go here? Is there an element that covers the location of various parts of the collection?

### *Chapter 7 (Note Elements)*

7.1.2.: First example: Does this belong in 6.3 Related Archival Materials Element? If so, it would also affect the first example on p. 79.

### *Chapter 8 (Description Control Elements)*

**p. 82:** As DACS is now defined as a value in the Description Convention Source Codes, remove the asterisk from the penultimate example and the asterisked note, "\*Note: DACS has not yet been defined as a value in the MARC Code List for Relators, Sources, Description Conventions."

## PART II

### *Chapter 9 (Identifying Creators)*

**p. 89**, Commentary paragraph 1: repeats points made in 2.6, which makes one wonder why this chapter couldn't have just been integrated with 2.6.

**p. 90**, "Identifying Creators," Commentary includes what seems as if it ought to be a cataloging rule (a supplied title may contain multiple creators' names if they are persons or families, but only one creator can be named in the title of a collection of records of a corporate body). This is a significant point, but seems buried here.

**9.10**: The examples could be clearer. One thing that makes them confusing is that they don't show where else the information on creators appears in the finding aid if one follows the option not to record it at the series, file, or item level, respectively, so the examples make it look as if the archivist were being given the option to omit the creator information entirely. Also, in the third example, if Gardiner Greene Hubbard is the creator of the biography of him, wouldn't it be an autobiography? If it's not an autobiography, wouldn't its creator be somebody else?

Another thing that makes Chapter 9 harder to absorb is that it's separated from its context. The creators it refers to are to be recorded in the Name of Creators Element, described in 2.6; and the rules for formulating the names are in Chapters 12-14. While one can readily understand the separation between rules for description and rules for access points (a separation also present in AACR2 and APPM), it's less clear why the authors felt it necessary to separate the rules for identifying creators from the Name of Creators Element. So a cataloger has to look in three different places to figure out what to put in the 100 or 110 field? This seems more complicated than necessary. There is doubtless a good rationale for this structure, but what is it? ISAD(G) doesn't have a split like the one between Parts I and II of DACS.

Examples of Encoding: very useful, but why is this here rather than directly following 2.6, like the encoding examples that directly follow the other elements of the description in Part I?

*Chapter 10 (Administrative/Biographical History)* --very informative, much more detailed than APPM 1.7B1

p. 93, paragraph 1 last line: should add the number of the Name of Creator(s) Element (2.6)

“nominal access points” --the phrase “name access points” would be clearer. “Nominal” has the connotation of “in name only” (i.e. not genuine), which just obscures the meaning here.

Again, the separation between Parts I and II of DACS seems artificial here. Essentially what 2.7 does is to refer people to Chapter 10 to find out how to proceed. Why make them go someplace else to find out?

*Chapter 11 (Authority Records)* --gives instructions for creating an archival authority record according to [ISAAR\(CPF\)](#)

**General comment:** This chapter of DACS anticipates RDA (Resource Description and Access), in that it gives instructions on how to formulate authority records, including much useful biographical or historical information, instead of just telling users how to formulate headings for authorized and variant forms, as AACR2 did. DACS is less granular than RDA, though, and might benefit from incorporating some of the data elements introduced by RDA, such as gender, associated language, etc.

**Another general comment on chapter 11:** It would be very helpful to the beginning cataloger to have some examples of archival authority records among the examples in Appendix D. Otherwise, instructions such as "record as a related name ..." (in 11.7) and "record as a variant ..." (in 11.8) seem abstract, and it might not be clear to the beginner how to implement them. (Actually there's a sample authority record at the end of Chapter 11, but still, it would be handy to have one in Appendix D as well.)

**Another general comment on Chapter 11:** it looks like an adaptation of ISAAR(CPF), structured according to AACR2. This begins to suggest why DACS has a Part II: it probably would have been too much to try to present the information on construction of an archival authority record and, at the same time, rules for formulating name headings. Still, an explanation of the rationale behind the three-part structure would be helpful.

It would be helpful to have an example of an archival authority record for a corporate body, too.

**Question:** What do we do if some libraries adopt RDA and others don't? Perhaps DACS could follow DCRM(G)'s practice of including alternative rules for RDA implementers. The authors of DACS have done a real service to the profession by formulating the rules in the light of FRBR, ISAD(G), and ISAAR(CPF), and taking both MARC and EAD formats into account. Still, Parts II and III of DACS rely heavily on AACR2, so if RDA is generally adopted, DACS will need a major overhaul.

**11.7**, on parallel forms of the name: a holdover from the CUSTARD project? Is there any need to keep this rule if DACS is not going to be used in Canada?

**11.9-11.10:** it would be helpful to specify in the rule that these other forms of name are to be recorded as variant names, especially in 11.9 (where the examples don't specify how the names are to be treated).

### **PART III**

**General comment on Part III:** Part III of DACS basically reproduces the sections of AACR2 that deal with the formulation of personal, corporate, and geographic names, and adds new rules for family names, which were not covered in AACR2: This was done to promote retrieval in an integrated catalog. Will this section be affected by the implementation of RDA (*Resource Description and Access*), if indeed RDA is implemented? RDA is not hugely different from AACR2 in its formulation of name headings, but there are differences: preference for the fullest form of name, elimination of most abbreviations ("born" for "b.", "died" for "d.", "approximately" for "ca."). Also, the RDA rules are structured quite differently from AACR2, in terms of organization and numbering, and they combine instructions for information that goes into an authority record with instructions on how to formulate a name as an access point (DACS devotes separate chapters to formulation of name headings and creation of authority records). Does DACS envision retaining Part III as is, retaining the current structure but rewriting parts of it to conform with RDA, or adopting the RDA structure wholesale?

#### ***Chapter 12. Form of Names for Persons and Families, Commentary:***

"Once a personal or family name has been chosen for recording in a Name of Creator(s) Element, for inclusion in an archival [authority record](#), or as a [nominal access point](#), the

form of that name must be standardized. . . . Therefore it is important for archivists to use the authority [TYPO FOR “authorized”] form of a name, if one exists, from the [Library of Congress Authorities.](#)”

## 12.29. Family names

**Comment:** AACR2 did not include rules for formulating access points for family names, so DACS added a section to cover this. It is very similar to the rules in the LC Subject Cataloging Manual for devising headings for families for use in subject indexing. RDA now devotes a whole chapter to formulation of family names as access points. The RDA rules are more detailed than DACS (e.g. they include a data element for type of family, such as dynasty or clan); RDA also provides a lot of guidance on how to break conflicts, by adding dates, geographic areas, or names of prominent family members. Will DACS want to retain the existing rules, or adopt the RDA rules?

## Appendices

### *Appendix A (Glossary)*

**Aggregation:** Term seems to apply to everything from a large records group to a file. Needs clarification at least

**Arrangement:** We realize this is from Pearce-Moses, but does anyone use “arrangement” in definition 1?

**Formal title:** definition should be more comprehensive and should be drafted in collaboration with DCRM(MSS). DCRM(MSS) has a working (\*not final\*) definition for Formal title. The definition in the two standards should be the same. Also, it is not accurate that a formal title always “prominently” appears in or on an item/collection

**Inventory:** suggest going back to Pearce-Moses on this: n. ~ 1. A list of things. – 2. Description · A finding aid that includes, at a minimum, a list of the series in a collection. – 3. Records management · The process of surveying the records in an office, typically at the series level.

=> Add entry for “Item-level description” and at some point mention the existence of DCRM(MSS)

*Appendix B (Companion Standards)*

**p. 209:** Graphic Materials: The Parker book will soon be replaced by *Descriptive Cataloging of Rare Materials (Graphics)*. (For more information: [http://www.rbms.info/committees/bibliographic\\_standards/dcrm/dcrmg/dcrmg.html](http://www.rbms.info/committees/bibliographic_standards/dcrm/dcrmg/dcrmg.html)).

Add mention of the forthcoming *Descriptive Cataloging of Rare Materials (Manuscripts)* for item-level description?

**p. 210,** top two entries: *The IASA Cataloguing Rules*: Is this the correct link? <http://www.iasa-web.org/iasa-cataloguing-rules>

**p. 210:** Objects: *Cataloging Cultural Objects* has been published: *Cataloging Cultural Objects: A Guide to Describing Cultural Works and Their Images*. Chicago: American Library Association, 2006. There is also an online CCO Commons at <http://www.vrafoundation.org/ccoweb/index.htm>

**p. 210:** Thesauri: *Art & Architecture Thesaurus*: the link in DACS will get you there but here is the new link: <http://www.getty.edu/research/tools/vocabularies/index.html>

**p. 210:** *Categories for the Description of Works of Art*: direct link: [http://www.getty.edu/research/publications/electronic\\_publications/cdwa/index.html](http://www.getty.edu/research/publications/electronic_publications/cdwa/index.html)

**p. 210:** *Medical Subject Headings*: Appears to have been updated in 2010.

**p. 211:** *Getty Thesaurus of Geographic Names*: direct link: <http://www.getty.edu/research/tools/vocabularies/tgn/index.html>

**p. 211:** *Union List of Artists' Names*: direct link: <http://www.getty.edu/research/tools/vocabularies/ulan/index.html>

**p. 212:** MARC 21 Format for Bibliographic Data: Including Guidelines for Content Designation: Title has been shortened to *MARC 21 Format for Bibliographic Data*. The link provides access to both the full and concise versions.

### *Appendix C: Crosswalks*

p. 213, ISAAR(CPF): a final version is available at <http://www.icacds.org.uk/eng/standards.htm>

p. 213, MARC 21: the link takes us to the overall MARC 21 website, which is not confined to the concise edition.

#### Table C1: APPM to DACS

- p. 214: 1.5B in APPM is called "Statement of extent", not "Extent"
- p. 214: APPM 1.7B15 Preferred Citation would map to DACS 7.1.5 Citation
- p. 215: APPM 3 Headings for Persons. The DACS entry should read "12 Form of Names for Persons and Families" not "... People and Families"

#### Table C3: ISAAR(CPF) to DACS

Comments are based on the "Final, 1 April 2004" 2nd edition of ISAAR(CPF): <http://www.icacds.org.uk/eng/ISAAR%28CPF%292ed.pdf>

- p. 217: Change ISAAR(CPF) 5.1.2 to read: Authorized form(s) of name
- p. 217: ISAAR(CPF) 5.1.6: the DACS match reads: Identifiers for corporate **bodies** [not names]
- p. 217: ISAAR(CPF) 5.2.5: the DACS column should read: 10.21, 10.30 Occupation, life, activities, Functions
- p. 217: Change ISAAR(CPF) 5.4.3 to read: Rules and/or conventions [plural]
- p. 217: ISAAR(CPF) 5.4.6
  - Change the ISAAR(CPF) 5.4.6 entry to read: Dates of creation, revision or deletion
  - Change the DACS column entry to read: Date(s) of authority record creation
- p. 218: ISAAR(CPF) 6.1 first word is: Identifiers [was lacking the "r"]
- p. 218: Change ISAAR(CPF) 6.2 to read: Types of related resources [plural]
- p. 218: ISAAR(CPF) 6.4: In the DACS column, delete "and/" to read: Dates of related resources or relationships

#### Table C4: DACS to APPM

- p. 219: DACS 2.2 "Name and Location of Repository" is missing.

Table C5: DACS to EAD and MARC

- Uncertain about **p. 221**, last two rows, EAD column: what do "See 2.6" and "See 2.7" refer to?

Table C6: DACS to ISAD(G)

- **p. 222:** DACS 2.2 "Name and Location of Repository" is missing.
- **p. 222:** DACS 11 is called "Authority records" not "Authority control"
- **p. 222:** DACS 2.6: in the ISAD(G) column, include the "(s)" to read: 3.2.1 Name of creator(s)
- **p. 222:** DACS 8.1.5 "Archivist and date" would also map to ISAD(G) 3.7.1

Table C7: DACS to ISAAR(CPF)

Comments are based on the "Final, 1 April 2004" 2nd edition of ISAAR(CPF):

<http://www.icacds.org.uk/eng/ISAAR%28CPF%292ed.pdf>

- **p. 223:** DACS 10.16: in DACS, the caption reads: Name(s)
- **p. 223:** DACS 10.19: in DACS, the caption reads: Place(s) of residence
- **p. 223:** DACS 10.24 says it maps to ISAAR(CPF) 5.2.9 Other significant information. There is no 5.2.9.
- **p. 223:** DACS 10.35: in DACS, the caption reads: Name(s) of Chief Officers
- **p. 223:** DACS 11.14: remove "the" from the ISAAR(CPF) 5.3.3 entry
- **p. 223:** DACS 11.15: remove "the" from the ISAAR(CPF) 5.3.2 entry
- **p. 224:** DACS 11.17: remove "the" from the ISAAR(CPF) 5.3.3 entry
- **p. 224:** DACS 11.18: in DACS, the caption is singular: Repository Code
- **p. 224:** DACS 11.29: Correct the typo to read "Types of related resources" not "Types of resource resources"
- **p. 224:** DACS 11.31: Delete "and/" to match the caption of p. 112 of DACS: Dates of related resources or relationships

*Appendix D (Full EAD and MARC21 Examples)*

Examples provided in EAD and then in MARC21: personal papers, family papers, organizational records, and a collection (what used to be called an artificial collection). These seem very helpful, especially the annotations referring people to particular DACS rules. The EAD examples would be easier to read if there were an extra space at the end of each major section of the finding aid, just to make things clearer. A sentence could be

added at the beginning of Appendix D to explain that the extra spaces are purely for visual clarity, not required by EAD (although we've found at our institution that using the extra spaces in the coding also helps a lot with visual clarity when one goes back to edit the finding aid—and the spaces don't affect how the finding aid displays).

**p. 269:** About the 300 field: wouldn't a 300 with two ways of describing the extent be recorded as 1 \$f v. (147 p.), rather than 1 \$fv. : 147 p.? (see rule 2.5.7)

Throughout the MARC21 examples, a first indicator will need to be added in 506 fields. Also, 555 first indicator is 0 if the note is about the finding aid (e.g. on p. 264). Also on p. 264: 545 first indicator should be 0 for an individual. Throughout, 541 fields will need first indicator 0 or 1.