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THE WHITE HOUSE
WASHINGTON
February 25, 1988

MEMORANDUM FOR PATRICIA BRYAN

FROM: BIFF HENLEY

SUBJECT: Presidential Guidelines Redraft

Here are the comments on the redraft you sent to me on February 23, 1988. Paper clips have been affixed at the appropriate points to help identify typographical errors and any questions that I could come up with.

PROCESSING-MANUAL FOR ...

Page 1, para 2 shouldn't the paragraph be revised to make clear the ultimate "determination whether access to a Presidential record ... shall be restricted shall be made by the Archivist, in his discretion, after consultation with the former president, ..." as worded in the Act 2204 (b) (3) and (e)? Or is this to "picky"?

PROCEDURES AND GUIDELINES FOR REVIEW ...

Page 6 after 9. a new section should be inserted as typed at the bottom of page

Page 6, 11. as I mentioned to you at our last meeting it is not practical for a supervisor to review all "open" files previously reviewed; it is sufficient to do a sample or spot review of reviewed material, and then only after a file segment or assignment has been completed

Page 7, 12. I still have a problem with this provision as I stated in our last meeting

GUIDELINES FOR SEGREGATING ...

Page 8, para 1 same as Page 6, 11. above

Page 11, para 4 after 12356 add "and NARA's Information Security Manual #202 (dated July 24, 1985"

Page 15, II "any type" is too restrictive

Page 16, III this is a much improved section from the original! The reviewers will be provided with copies of the applicable sections of cited statutes, won't they?

Page 23, V the criteria for application appears to be to restrictive

Page 27, para 4 I don't see how we would be able to protect the names

The section on REVIEW WITHDRAWAL SHEETS was not attached. I have attached a copy of them.

REVIEW WITHDRAWAL SHEETS

Documents that contain restricted information will be removed and a withdrawal sheet prepared, comprised of an original and at least one copy.

The exact original file location from which an item was removed should be marked by a document/page location sheet so that the item may be replaced when it is opened.

1. A withdrawal sheet and as many copies as necessary to properly control withdrawn materials should be prepared for each folder containing material that is to be removed. The original withdrawal sheet is filed in front of the folder which contained the restricted material, and the control copy is attached to or placed with the removed material from each folder in a segregated parallel file.

The withdrawal sheet, commonly called a "pinksheet", fulfills three functions: provides the researcher with the information that restricted material has been withdrawn; provides the researcher with sufficient information to identify items for restriction appeals and mandatory review; and assists the library staff in maintaining archival control over the removed material. To assure proper refiling, the control copy should be retained with the removed documents at all times.

2. The withdrawal sheet is essentially a listing of items withdrawn. For each folder, all withdrawn items are numbered in the left or first column in sequence 1, 2, 3 ... etc.. When more

than one item is withdrawn from a single letter case, however, those particular items share the same number and are differentiated by letter 3a, 3b, 3c ... etc.. The letter case sequence is preceded in the first column by an underlined designation "ltr. case".

3. The withdrawal sheet will contain an entry for each document removed, except as noted below. If the entire contents of a file folder are restricted, a new folder containing only the withdrawal sheet should be substituted in its place. When the contents of an entire box are removed, a withdrawal sheet for the entire box should be foldered and placed in a properly labeled box in sequential order with the open material. When the contents of an entire series are removed, the withdrawal sheet for the series should be foldered and placed at the end of the preceding box. Withdrawal sheets for entire boxes and series need not list each item withdrawn. Instead, a notation to the effect that the entire box or series has been withdrawn will be inserted.

4. In instances of which a number of fairly routine documents of the same type in a folder, an entire folder, or even a box, are closed for the same reason, a summary description of the following kind may suffice: "20 letters from the general public relating to loss of medicare benefits" or "30 letters of inquiry relating to jobs in the FBI."

1983;" or "Memo, Reagan to William Casey"), or the original withdrawal sheet can remain blank except for a note that an item has been withdrawn ("Item withdrawn").

Never cite any National Security Agency document except by control number. Also, never give the title of: any CIA report or study, National Security Study Memorandum (NNSM), National Security Decision Memorandum (NSDM), National Security Council Intelligence Directive (NSCID). Occasionally, an abbreviation of the security classification level appears next to the title. Even identification by number (e.g., "NNSM 247") may in the context of surrounding material reveal more than is proper. These prohibitions are necessary because the very existence of a document may be classified. In such instances, the reviewer may simply note on the pinksheet "Item withdrawn". When in doubt, consult with your supervisor.

8. Also in the second column, if the item is being withdrawn for national security reasons show exact number of pages of the item if more than one page.

When the reviewer restricts an unmarked item because its content is virtually identical to that of a nearby security classified item, he may indicate "(open when item ____ declassified)".

9. In the third column show the date of the items. If an item is undated, so indicate (n.d.).

5. In the space provided for the file location, the following information should be included: the group or collection title; series title; folder title; and any other pertinent information necessary to ensure correct refiling.

The reviewer reviewing the material will also initial and date the control copy of each withdrawal sheet in the right margin of the file location block.

6. When reviewing collections with security classified materials, the library staff will separate classified material from non-classified documents. The control copies of the withdrawal sheets will ^{also} reflect the classification level of the withdrawn material. A separate file will be kept of copies of withdrawal sheets containing references to Top Secret materials for the Top Secret inventory, as required by ISOO Directive Number 1.

7. It is the policy of the National Archives to provide researchers with as much information on restricted materials as possible without divulging information prejudicial to the reason for restriction. The withdrawal sheet therefore allows space in the first column for document identification or form (letter, memo, report); in the second column for name of correspondents or title; and in the third column for the date. If the reviewer feels that providing such information would compromise security-classified or restricted information, either an abridgement can be made (e.g., "Letter to President, May 3,

WITHDRAWAL SHEET (RONALD W. REAGAN LIBRARY)

DOCUMENT

NO. & TYPE

SUBJECT/TITLE OR CORRESPONDENTS

DATE

RESTRICTION

FILE LOCATION

RESTRICTION CODES

- A. National Security classified information ✓
- B. Release would violate a Federal statute
- C. Release would disclose trade secrets or confidential commercial or financial information H.
- D. Release would constitute a clearly unwarranted invasion of personal privacy I
- E. Relating to appointment to federal office J.
- F. Release _____

Restriction Codes

- A. National security classified information
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- C. Release would disclose trade secrets or confidential commercial or financial information
- D. Release would constitute a clearly unwarranted invasion of personal privacy
- E. Relating to appointment to federal office
- F. Release would disclose confidential advice between the President and his advisors, or between such advisors.
- G. Release would disclose internal personnel rules and practices of an agency.
- H. Release would disclose information compiled for law enforcement purposes.
- I. Release would disclose information concerning the regulation or supervision of financial institutions.
- J. Release would disclose geological or geophysical information concerning wells.

RONALD W. REAGAN LIBRARY

This form marks the file location of item number _____
listed on the pink Withdrawal Sheet at the front of this folder.

THE WHITE HOUSE

WASHINGTON

February 18, 1988

MEMORANDUM FOR PATRICIA M. BRYAN
ASSOCIATE COUNSEL TO THE PRESIDENT

FROM: CLARENCE L. HENLEY *Biff Henley*
DIRECTOR, OFFICE OF RECORDS MANAGEMENT

SUBJECT: DRAFT PROCEDURES AND GUIDELINES FOR
REVIEW OF THE PRESIDENTIAL PAPERS

First, let me thank you for this mornings meeting. Second, I will not be in the office tomorrow so I thought it best to make a couple of comments regarding the guidelines draft today.

1. Page 1, para. 2, line 7 - the word "completion" it appears to me that in the Presidential Records Act, Section 2204 b(2)(B); "...or integral file segment thereof" means, in my words, whatever is complete at the time. Is this your understanding also?
2. Page 2, last para. "Biff Henley" should read "The Director of The White House Office of Records Management".
3. Page 3, 2. (how?) I can only say through individual education.
4. Page 3, 8. (explain) it is in the draft manual chapter titled "Processing guidelines"
5. Page 4, 9. (?) same as 4. above
(to where?) wherever is appropriate within the
RR Library- books to library - museum
items to museum
6. Page 4, 11. I really don't think it necessary for a supervisor to re-review every document, a sampling should suffice
7. Page 4, 12. I don't understand why the incumbent President would review unless there is a disagreement between the former President and the Archivist.

Until next time have a wonderful weekend.

DRAFT

PROCEDURES AND GUIDELINES FOR REVIEW OF THE PRESIDENTIAL RECORDS CREATED BY THE REAGAN ADMINISTRATION

OVERVIEW

The following are preliminary procedures and guidelines for use by those employees of the National Archives charged with reviewing and segregating into appropriate categories Presidential records under the Presidential Records Act. Because there has been no previous experience with reviewing and segregating records under the terms of the Presidential Records Act, both the procedures and the guidelines are of necessity tentative at this time.

The terms of the Presidential Records Act strike a balance between full public disclosure of documents of historical interest on the one hand, and the necessity of protecting personal privacy rights as well as the confidentiality of sensitive government information (e.g., national defense information) on the other. Under the Act, after the earlier of either five years after President Reagan's term expires or the completion of the Archives processing of all Presidential records, documents are to be made available to the public unless they fall within one of the six categories the Presidential Records Act allows and President Reagan has chosen to remain restricted for 12 years or one of the nine applicable restricted categories under the Freedom of Information Act.

2204
b(2)(6)

The current task of the National Archives personnel is to describe and review these documents and determine which of them should be made available to the public in the near future (within five years after the expiration of President Reagan's term at the latest) and which ones fall within the restricted categories found in the Presidential Records Act or the FOIA. Documents which do not fall within a restricted category should be placed into "open files", documents that do fall within one or more restricted categories should be segregated into "closed files," appropriately marked with the applicable restriction(s).

Under the Act, the Archivist has an affirmative duty to make Presidential records available to the public as "rapidly and completely as possible" but only to the extent that public access is "consistent with the provisions of this Act." This means that the basic desire on the part of professional archivists to make documents available to the public must be tempered by the Act's constraints on premature and inappropriate disclosure. Full consideration must be given the the President's desire to protect sensitive documents. If a document falls within one of the categories under which the President has elected to restrict access, Archives personnel are obligated under the Act to so

restrict access to that document. Because mistakes in restricting access to documents that should be made available to the public can be easily remedied (and with the passage of time will likely automatically be so remedied), while the untoward consequences of premature release can never be remedied and may act as a disincentive to continued full documentation by future Presidents, truly close decisions should be resolved in favor of restricting access to the document.

Describing, reviewing, and segregating Presidential records is primarily the responsibility of the National Archives, although the Act does require that the Archivist place documents into the restricted categories in consultation with the President by, for, or under whom the documents were created. To the extent that these activities are conducted at the White House before the termination of President Reagan's term of office, however, ultimate physical control over the documents remains with the White House. Any need for access to documents by White House staff for use pursuant to official duties must take precedence over the processing of the documents under the Presidential Records Act. Because physical control of the records remains with the White House until the President completes his term of office, the five year period provided to the Archivist under the Act for processing the records will not begin to run until expiration of the President's term.

Archives personnel involved in describing, reviewing and segregating Presidential records occupy a position of trust which must not be compromised. Such personnel are not to discuss the contents of the documents that they are reviewing -- whether or not they believe such information to be subject to a restriction from access -- outside the workplace. Nor should they compromise their position by engaging in idle discussions of materials with co-workers. In general, questions having to do with specific documents should be addressed to one's supervisor. Finally, sharing information found in classified materials with anyone other than a supervisor with the necessary clearances, for whatever reason, is flatly prohibited.

Any questions concerning these procedures or guidelines should be directed to a supervisor or to Biff Henley.

The Director of the WHORM

PROCEDURES

1. Before beginning actual review of any documents, reviewers must thoroughly familiarize themselves with the statutory criteria under which their review must proceed. These criteria are found in the Presidential Records Act of 1978 and the Freedom of Information Act. While the attached guidelines attempt to provide an easy reference for reviewers, they are no substitute for a thorough understanding of the law.
2. Reviewers must also familiarize themselves with the personalities, issues and events of the Reagan Administration.
(how?) *Education*
3. Reviewers will be provided with the file segments on which they are to work by a supervisor charged with keeping track of all files on which work by Archives personnel is being performed.
4. After receiving a file segment, reviewers should first do a preliminary review to determine whether the file segment may be opened or closed in its entirety without the usual page by page review. Any decision by a reviewer to open or close an entire file segment is preliminary and must be confirmed by a supervisor.
5. In general, documents are to be reviewed page by page. If the document contains restricted material, ordinarily the entire document should be restricted. Where possible, however, the reviewer must open useful nonrestricted segments of a document containing restricted material by sanitizing or redacting the restricted information. Reviewers should attempt to open portions of documents containing restricted information if and only if the document contains a significant enough amount of nonrestricted material to be useful and reviewers can open that material without compromising the restricted information.
6. Where a number of documents are fastened together to constitute a "letter case" (also called a "case file"), reviewers are to remove restricted documents or pages so that the rest of the case may be opened. Where the remaining nonrestricted material is inconsequential, reviewers should simply restrict the entire letter case.
7. Reviewers are to prepare withdrawal sheets for all closed material, under the specifications found in the attached section entitled "Review Withdrawal Sheets."
8. In addition to reviewing the documents provided by the appropriate supervisor, reviewers are also responsible for adequately describing those documents. (explain) *Processing & Archiving*

*Presiding - Amey
Let's
man*

9. Reviewers are also responsible for: (a) ensuring that all documents have been placed in their appropriate files and that all files have been placed in their appropriate box; (b) reproducing all deteriorating documents; (c) removing paper clips, rubber bands and other extraneous matter; (d) reproducing useful information for the vertical file (?); (e) transferring books, maps, audiovisual, and museum items (to where?); (f) removing uniquely valuable items (?) *Presiding Amey*

10. After a review of each folder is completed, reviewers are to stamp, initial, and date that folder in the upper left corner of the front fold. Upon completed review of each box of folders, reviewers are to stamp, initial, and date the box in the lower righthand corner.

11. Upon completion by reviewers of the above procedures for a box or some other segment of files, reviewers are to transfer the segment to a supervisor for review. Because of the potentially serious adverse consequences that could arise from premature or inappropriate disclosure of documents, supervisors should be particularly careful in reviewing files the reviewer has denominated as "open" files. Upon completing a review, a supervisor should stamp, initial, and date the box in the lower righthand corner directly above the similar markings made by the reviewer. *Do not*

(see number 11?)

12. Upon completion of review by the appropriate supervisor, any document denominated as "opened" must then be provided to both President Reagan and the President on whose watch the documents are to be opened for review for executive privilege or other privilege problems. *No*

?

GUIDELINES FOR SEGREGATING DOCUMENTS

The criteria for restricting access to particular documents are found in the Presidential Records Act of 1978 and in the Freedom of Information Act. It is not easy to provide meaningful guidance on how to apply those restrictions and reviewers should understand that the guidance offered below is by necessity simplistic and incomplete. Overall, reviewers should rely on the law and use common sense in making judgments on whether to restrict access to or open particular records and should make sure that their initial judgment to open a document is confirmed by a supervisor.

As authorized by the Presidential Records Act, President Reagan in a letter to the Archivist, dated June 9, 1981, elected to restrict access for 12 years after the expiration of his term of office to Presidential records that fall within one or more of the six categories set forth in section 2204(a) of the Act. Under the Act, access to documents falling within one or more of those six categories must be restricted.

Under the Presidential Records Act, documents that do not fit within any one of the six specified restricted categories do not automatically become publicly available. Rather, those records are to be administered in accordance with the FOIA as are the records that currently do fit within one or more of the six categories after the 12-year period expires. Under the FOIA, records can be withheld from public disclosure if they fit within one or more of eight categories. A ninth category, FOIA exemption (b) (5), is not available as a basis for restricting access to Presidential records.

Because the language of several of the 12 year restrictions on access to documents under the Presidential Records Act mirrors the language of restrictions on access under FOIA, there are basically only 10 restricted categories altogether, although, as indicated below, the meanings of those Presidential Records Act restrictions are not in all instances identical to their FOIA counterparts. Those 10 statutory categories are set forth verbatim below, followed by some general guidance to aid the reviewer in identifying the items that fall within each category. Much of the guidance for the pure FOIA exemptions and the Presidential Records Act exemptions that have FOIA counterparts comes from the Justice Department Guide to the Freedom of Information Act. Reviewers should thoroughly familiarize themselves with that guide and the case law discussed therein.

While much of the law developed under FOIA provides useful definition to the Presidential Records Act exemptions, the Presidential Records Act exemptions are in some instances broader in scope than the same exemptions found in FOIA. While the FOIA exemptions often require balancing the interest to be protected in the exemption against the benefits to the public of disclosure, the Presidential Records Act exemptions require no such balance.

Under that Act, the balance is struck by removing the exemptions altogether after 12 years. Because these guidelines are provided for the initial processing of records, they concentrate in the overlap categories on the meaning of the Presidential Records Act exemptions rather than the FOIA exemptions.

Finally, reviewers should understand that under the Presidential Records Act information that would otherwise fall within one of the exemptions may be made publicly available only if the President or one of his agents has through publication made the information available. For example, information that has been leaked to the press does not lose its protected status. Consequently, unless otherwise specified in the guidelines below, information in the public domain must still be protected under the Presidential Records Act exemptions (but not necessarily all of the FOIA exemptions) unless the reviewer knows that it was made public by the President or by an advisor to the President acting in an official capacity.

As a general matter, reviewers should remember that these restricted categories represent Congress' attempt to protect vital constitutional and policy interests of both individuals and the government and should be given their full scope. Reviewers must be careful not to undermine congressional intent by making their own decisions to allow access to particular documents technically covered by one of the restrictions on the ground that access would not be harmful to any interest of which the reviewer is aware. While common sense should be employed in reading these restrictions and making decisions as to whether documents do or do not fall within them, reviewers are not at liberty to employ common sense to fashion "exceptions" to the restricted categories.

Access shall be restricted with respect to information in a Presidential record, within one or more of the following categories:

I. Exemption (a)(1) of the Presidential Records Act and (b)(1) of the FOIA: "(A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) in fact properly classified pursuant to such Executive order."

- Reviewers must familiarize themselves with the requirements of Executive Order 12,356.
- Reviewers should presume that information bearing classification markings is appropriately classified. If it does not appear to be, the reviewer should bring it to the attention of an appropriate supervisor, who should seek the advice of the classifying agency.

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Under the Presidential Records Act, documents that do not fit within any one of the six specified restricted categories do not automatically become publicly available. Rather, those records are to be administered in accordance with the FOIA as are the records that currently do fit within one or more of the six categories after the 12-year period expires. Under the FOIA, records can be withheld from public disclosure if they fit within one or more of eight categories. A ninth category, FOIA exemption (b) (5), is not available as a basis for restricting access to Presidential records.

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While much of the law developed under FOIA provides useful definition to the Presidential Records Act exemptions, the Presidential Records Act exemptions are in some instances broader in scope than the same exemptions found in FOIA. While the FOIA exemptions often require balancing the interest to be protected in the exemption against the benefits to the public of disclosure, the Presidential Records Act exemptions require no such balance.

Under that Act, the balance is struck by removing the exemptions altogether after 12 years. Because these guidelines are provided for the initial processing of records, they concentrate in the overlap categories on the meaning of the Presidential Records Act exemptions rather than the FOIA exemptions.

Finally, reviewers should understand that under the Presidential Records Act information that would otherwise fall within one of the exemptions may be made publicly available only if the President or one of his agents has through publication made the information available. For example, information that has been leaked to the press does not lose its protected status. Consequently, unless otherwise specified in the guidelines below, information in the public domain must still be protected under the Presidential Records Act exemptions (but not necessarily all of the FOIA exemptions) unless the reviewer knows that it was made public by the President or by an advisor to the President acting in an official capacity.

As a general matter, reviewers should remember that these restricted categories represent Congress' attempt to protect vital constitutional and policy interests of both individuals and the government and should be given their full scope. Reviewers must be careful not to undermine congressional intent by making their own decisions to allow access to particular documents technically covered by one of the restrictions on the ground that access would not be harmful to any interest of which the reviewer is aware. While common sense should be employed in reading these restrictions and making decisions as to whether documents do or do not fall within them, reviewers are not at liberty to employ common sense to fashion "exceptions" to the restricted categories.

Access shall be restricted with respect to information in a Presidential record, within one or more of the following categories:

I. Exemption (a) (1) of the Presidential Records Act and (b) (1) of the FOIA: "(A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) in fact properly classified pursuant to such Executive order."

- Reviewers must familiarize themselves with the requirements of Executive Order 12,356.
- Reviewers should presume that information bearing classification markings is appropriately classified. If it does not appear to be, the reviewer should bring it to the attention of an appropriate supervisor, who should seek the advice of the classifying agency.

PRESIDENTIAL RECORDS (WHORM Files)

I. DEFINITIONS

Archives personnel will be reviewing, describing, and segregating "Presidential Records". The term "Presidential Records", as well as related terms which may provide additional insight on the meaning of that term, is defined in the Presidential Records Act of 1978. For ease of reference, the statutory definitions of those terms are printed in full below.

The term "Presidential Records" means "documentary materials, or any reasonably segregable portion thereof, created or received by the President, his immediate staff, or a unit or individual of the Executive Office of the President whose function is to advise and assist the President, in the course of conducting activities which relate to or have an effect upon the carrying out of the constitutional, statutory, or other official or ceremonial duties of the President." With the exception of the President's personal papers, the term "Presidential Records" encompasses all material formerly known as "Presidential Papers".

"Such a term -

(A) includes any documentary materials relating to the political activities of the President or members of his staff, but only if such activities relate to or have a direct effect upon the carrying out of constitutional, statutory, or other official or ceremonial duties of the President; but

(B) does not include any documentary materials that are (i) official records of an agency (as defined in section 552(e) of

title 5, United States Code) [known as Federal Records]; (ii) personal records; (iii) stocks of publications and stationery; or (iv) extra copies of documents produced only for convenience of reference, when such copies are clearly so identified.

The term "personal records" "means all documentary materials, or any reasonable segregable portion thereof, of a purely private or nonpublic character which do not relate to or have any effect upon the carrying out of the constitutional, statutory, or other official or ceremonial duties of the President. Such term includes -

(A) diaries, journals, or other personal notes serving as the functional equivalent of a diary or journal which are prepared or utilized for, or, circulated or communicated in the course of, transacting Government business;

(B) materials relating to private political associations, and having no relation to or direct effect upon the carrying out of constitutional duties of the President; and

(C) materials relating exclusively to the President's own election to the office of the Presidency; and materials directly relating to the election of a particular individual or individuals to Federal, State or local office which have no relation to or direct effect upon the carrying out of constitutional, statutory, or other official or ceremonial duties of the President."

"The term 'documentary material' means all books, correspondence, memorandums, documents, papers, pamphlets, works of art, models, pictures, photographs, plats, maps, films, and

motion pictures, including, but not limited to, audio, audio-visual, or other electronic or mechanical recordings."

II. INTRODUCTION - WHORM FILES

A permanent unit within the White House Office (White House Office of Records Management) has maintained a central filing and retrieval system for President Reagan and his staff. The files of (WHORM) include a complex of interrelated and special purpose file groups and series. The WHORM files consist of three basic file groups: the Subject File, the Name (Alpha) File, and the Staff Member and Office Files (SMOFS).

The President's White House Office staff used the WHORM, (e.g., speechwriters; economic, legal, and congressional affairs staff; scheduling, advance and public liaison staff). The staffs of the Council of Economic Advisors (CEA), Office of Policy Development (OPD) and the National Security Council (NSC) have also used the WHORM. NSC usage was generally limited to unclassified or low security materials. Most classified material is stored within the NSC Secretariat.

In subject content and document type, the WHORM files reflect all the diverse activities of the White House including: correspondence with the general public; policy-making and policy implementation; routine administrative functions; political activities that relate to the constitutional duties of the President; and social events and ceremonial aspects of the office. The public activities of the First Lady are also documented.

Upon the resignation of any member of the White House staff, he or she is required to sign a statement, administered by the WHORM, affirming that all Presidential records as defined in the "Presidential Records Act of 1978" remained with his or her office or successor, or had been delivered to the WHORM. A brief oral history interview was also conducted with selected staff in policy positions, concerning the duties and function of the departing staff member.

III. WHORM SUBJECT FILE

Content

The Subject File is the heart of the WHORM files, where most substantive material is located. It includes: memoranda, letters, telegrams, reports, cables, publications, press releases, speeches, lists, drafts, clippings, briefing papers, schedules, invitations, courtesy messages, and public opinion mail.

This material is the product of staffs of the White House Office, Office of Policy Development, National Security Council, and Council of Economic Advisors staffs. In addition to material prepared by them, it includes related communications from: officials at all levels and branches of Federal, state and local government; political advisers and organizations; spokesmen for or members of various economic, political, ethnic, religious, and professional groups; foreign officials; and the general public.

Content reflects political, policy, administrative, personnel, and public relations concerns; including those

domestic and foreign, significant and insignificant. Relatively little material security classified as "Secret" or higher is included.

Arrangement

The Subject File is an alpha-numeric file system of 60 primary subject codes or categories divided into numerous sub-categories. The alpha-numeric subject classification system was developed in the late 1950's and implemented during the Kennedy Administration. The system has been retained, with minor modifications, since that time. The records are extensively cross-referenced via the C-TRACK or the SECLOG computer access systems, which have replaced the old manual cross-referencing system formerly located within the files. The WHORM staff assigned the category classifications, identification numbers, and devised cross-references as items were received for filing.

Arrangement is numerical by identification number within each sub-category and folder, which works out to be roughly chronological.

Satellite Files

The Subject File has four satellite files created to protect confidentiality or to solve storage problems.

Oversized Material:

Bulky items such as thick document cases, books and other publications, posters, petitions, as well as Staff Member and Office Files (SMOFS) retired in segments larger than a few items, were assigned control numbers upon receipt and stored in numerical order. These were known as Oversize Attachments (OA).

The few items that would not fit into a standard Federal Records Center (FRC) box, such as posters or charts, were numbered in a separate sequence and called Oversize Attachments - Shelf (OA-Shelf) because of their storage requirements. Both OA and OA-Shelf material are retrieved via the STAIRS retrieval system and the OA and OA-Shelf logs (green books), which are also computerized in a separate system for OAs.

Confidential Material:

A member of the White House or the WHORM staff sometimes determined that an item required restricted access because it was security classified or otherwise sensitive. Therefore, parallel Subject and OA files were established and kept under tighter access controls. They were known as Confidential File (CF) and Confidential File Oversize Attachments (CFOA) respectively. The contents of both were retrieved via the STAIRS retrieval system and the CFOA logs.

Part of CF and much of CFOA consists of Staff Member and Office File material, while the bulk of it is from the Subject File. To facilitate research, the CF material will be interfiled into the main Subject File or the SMOF files where appropriate, as has been done by recent Presidential libraries. CF items are identified within the Subject File by blue cross reference sheets, and by the stamped mark "C.F." on the document.

OA, OA-Shelf, and CFOA materials that are part of the Subject File will be reviewed and processed by "review on request". There is also a small number of CFOA-Shelf items, consisting primarily of matrix or signature wheels.

IV. WHORM NAME (ALPHA) FILE

The Name File, also known as the Alpha File, consists primarily of routine material not recorded in the Subject File; such as correspondence answered with a form acknowledgement, autographed photos, invitations declined, agency referrals, much of the First Lady's correspondence, and letters in support of the President. Some of the Name File material is cross-referenced via C-TRACK STAIRS, but most of it is not.

The Name File is arranged alphabetically by name of person, organization or event at the folder level, but arrangement is in rough chronological order within each folder. The Name File and the parallel OA material is processed on a "review-on-request" basis.

V. STAFF MEMBER AND OFFICE FILES (SMOFS)

Virtually all WHORM users retained additional files in their own offices for reasons of convenience, confidentiality, or both. As these office files accumulated and as staff members left the White House staff, portions were periodically forwarded to WHORM for general storage and portions will be retained in the offices until the end of the administration. These accumulated office files are known as "White House Staff Member and Office Files" (SMOFS).

When SMOF material was transferred to WHORM, it would include a file folder list of the contents of each box. The WHORM staff would assign an OA or CFOA number to each box and input the file folder list and other basic information into the

C-TRACK system. All SMOF records are cited in C-TRACK under subject codes FG006-01 (White House Office), FG006-03 (Council of Economic Advisers), or FG006-07 (Office of Policy Development); and cross-referenced under appropriate codes matching the file folder listings. Files of the National Security Adviser's office and other NSC staff are maintained by the NSC Secretariat.

All SMOF material transferred to WHORM during the administration will be consolidated with SMOF material located in the offices at the end of the administration, and organized by office and/or staff member.

VI. BULK MAIL

The Reagan Administration has received voluminous routine correspondence from the general public that is referred to as "bulk mail". This type of material includes public opinion mail, requests for photographs, holiday greetings, get well messages, crank mail, and support mail.

The Reagan Administration, is the first administration to systematically dispose of bulk mail. In an agreement with NARA, authorized by the Presidential Records Act, WHORM and NARA's Office of Presidential Libraries (NL) have instituted sampling procedures for bulk mail scheduled for disposal. Over 300 cubic feet of sampled bulk mail has been retained out of over 18,000 cubic feet macerated and recycled; a sampling of about 1½%.

PROCESSING GUIDELINES

Processing historical materials is a major function of each Presidential library. Processing consists of arrangement, description, and review. Each of these tasks should be accomplished before materials are made available for research.

ARRANGEMENT

Arrangement is the proper ordering of materials within a collection and the placement of materials in archival storage areas. All files should be kept in original order if they have any logical order, such as the alpha-numeric arrangement of the WHORM Subject File. If the folders and documents are not arranged systematically, they should be placed in logical order. A useful approach to overall organization is to place the most comprehensive series, either by date or by subject coverage, at the beginning, followed by more specific series arranged alphabetically or chronologically.

For White House Staff Member and Office Files (SMOFS) and most personal paper collections, the records should generally be arranged in the following order of importance:

1. The most important files are those denoting responsibilities, scope of job, policy formulation and implementation, relationships with the President and White House aides, official chronological files, official diaries, subject-memoranda files, and files containing the working papers of White House conferences and task forces.

2. Second in importance are such files as administrative and housekeeping files, personal chronological files, appointment calendars, files of speeches declined, sympathy or congratulatory correspondence, and personal invitations.

3. Least important are printed materials, files containing only transcripts of press conferences, and files of press releases and news clippings.

After the processor gains familiarity with a body of materials and is able to determine a likely arrangement, he should then write a brief arrangement proposal and present it to the project supervisor. No arrangement should be attempted until the proposal is approved.

Since the processor must do a folder by folder review, and if necessary a page by page review, arrangement and review will usually be completed in one operation. (For withdrawal and segregation procedures, see chapters on Review, Review Criteria, and Review Withdrawal Sheets.)

Refoldering and Reboxing. Most records will be refoldered and reboxed into acid-free folders and acid-free archives (hollinger) boxes. This function is necessary for preservation as well as rearrangement and accessibility to the material.

1. The amount of material included in a folder should be limited to about 50-60 pages, or enough to fill the standard folder to the first crease.

2. Where possible, material of the same letter of the alphabet or date span should be in one folder.

3. If the folder must be broken into additional folders they should be numbered sequentially within square brackets following the folder title; e.g. [1 of 5].

4. In most cases, strictly duplicate records should be removed from the file for eventual disposal.

5. Boxes should be packed to avoid "slumping" but not so full as to hinder the removal of items.

6. Processors should number boxes for an entire file group in one sequence.

7. Legal size folders and boxes should be used, unless all but a few pages of material within a box are letter size - such as most of the subject codes in the WHORM Subject File. Letter size folders should not be placed in legal size boxes.

Labeling Boxes. Labeling follows reboxing of the entire body of records. There is always last minute shuffling to be done before labels may be affixed. Temporary labels may be fastened with paper clips during processing or the information may be written lightly in pencil on the front of each box. Box labels should include the title of the collection, file group, series and subseries, the inclusive folder contents (i.e., the first and last folder titles), and the box number.

Example: RONALD W. REAGAN LIBRARY

REAGAN, RONALD W.: Records as President
of the United States, 1981-89

Subject File
CA Civil Aviation

CA - CA002

Box 78

Folder Description. The original file folder title should be retained, unless it does not describe the contents of the folder.

1. If the folder title is vague or incomplete, information may be added to the title and must be enclosed in square brackets to differentiate it from the original title.

2. If an abbreviation or acronym is unclear, it should be spelled out in brackets on the folder title list.

3. If all the folder titles are assigned by the processor, it is not necessary to place the titles within brackets, but a statement that the titles were assigned should appear in the register.

4. Empty folders should be retained as an indication that material was either anticipated (a folder set up but nothing filed in it) or removed. After the title of an empty folder, "[Empty]" should be written on the folder and on the Folder Title List.

5. Include dates or date span as an extension of the folder title when appropriate; e.g. Trade Legislation [June 1982 - Dec. 1984].

6. On the File Folder Title List, selectively use brackets to clarify, downplay or highlight:

Motor Vehicle Safety Standard 121 [airbrakes]

Rome Airport Bombing [press release]

Florida, Orlando 3/8/83 [includes analysis of political situation in the state of Florida]

7. For the WHORM Subject File, be as specific as folder contents allow, indicating subject code and title followed by date span and document/case identification number sequence for material within the folder - both placed in brackets; e.g.,

FG016-02 Civil Air Patrol [1981-1983] [1-1406]

If all of the material for a subject code is included in one folder it is not necessary to indicate the date span or the ID number sequence. If folders are divided into additional folders it is not necessary to number the folders, it is sufficient to indicate the ID number sequence within brackets.

8. Folder titles of key people should be identified in brackets on the folder title list; e.g. Pauken, Thomas W. [Director of ACTION]

The processing archivist will find it convenient to take notes on each folder in a box, recording significant items as well as information about the contents of the folder and major correspondents. These notes serve as background for developing the series descriptions, preparation of the scope and content note of the register, and subject annotations for the folder title list. Not every folder will contain information of sufficient importance to be recorded; a general statement in the series description is usually adequate in some cases. If the archivist is processing a WHORM subject category it would be useful to also record the presence of Oversize Attachments. Some collections or file groups, such as the WHORM Subject File, do not require folder title lists or detailed subject description because of their large volume and other forms of detailed description, such as the STAIRS computer access to the WHORM Subject File.

Vertical File. A reference file of copies of useful openable documents discovered during review should be established. These copies could later evolve into a vertical file for clippings, conference papers, articles, etc..

PROCESSING NON-TEXTUAL AND BULKY MATERIALS

There will be audiovisual materials, museum objects, maps, books and other publications in many files. Materials other than audiovisual materials should generally be left with the records if they have annotations or other clear indications that they were used in connection

with the files. If materials are removed, a Transfer Sheet will be placed in the file.

Publications. Books and other publications not directly related to the files should be turned over to the Book Collection. Each item should have the following annotations in pencil on the inside of the front cover:

1. Name of collection or file group, and series
2. Accession or Pre-accession number
3. Date removed
4. Initials of the archivist

A Transfer Sheet (for audiovisual material, books, museum & other items) will be prepared. The original will be left in the location of the publication removed and a copy will be transferred with the item. In addition to the basic information on the bottom of the Transfer Sheet (file location, etc.) it should list the following information:

1. Author
2. Title
3. Publisher
4. Date of publication (copyright date)
5. Name of donor (if applicable)

The archivist should keep in mind that if a publication is a signed report required by law or regulation to be submitted to the President, it is a document and should be kept with the records.

Museum Objects. In most cases, preservation of the records requires that museum objects be removed from the files. Unique or valuable items should be sent to the museum collection, along with copies of relevant textual materials. The processing archivist should

insert a Transfer Sheet in the files for each item and forward a copy with the object to the curator. Information on the Transfer Sheet should include description and provenance of the object.

Audiovisual Materials. Motion picture films, video tapes, sound recordings, black and white still photographs, and color photographs and transparencies in the files should be turned over to the audiovisual archivist with a copy of the Transfer Sheet.

1. The original Transfer Sheet will be inserted in the files.
2. The processing archivist should not attempt to play audiovisual materials, but should record information from labels, containers, or accompanying documents.
3. Video tapes, audio tapes, phonograph records, and other sound recordings should be described by exact type.
4. An electrostatic copy of photographic prints should be made and attached behind the original Transfer Sheet within the files.
5. If a letter or page gives information about a withdrawn item, it should be copied and the copy sent with the item and Transfer Sheet to the audiovisual archivist.
6. A photograph may be retained in the papers if it is simply a snapshot from the general public, accompanies a resume, or is useful if left in its original location; but it should be placed in a polyester sleeve.

Scrapbooks.

1. If a scrapbook contains only photographs, it should be transferred to the audiovisual archivist using procedures for the removal of audiovisual materials.

2. If a scrapbook contains only newspaper clippings, the processing archivist should consult the project supervisor.

3. If a scrapbook is a combination of photographs and newspaper clippings, the processing archivist should photocopy the scrapbook for the files and turn the scrapbook over to the audiovisual archivist following the same procedure for photographs.

Maps. Maps should be kept in the files unless they are oversize or of extraordinary value. Oversize maps should be handled as oversize publications.

PRESERVATION

The following guidelines are intended to instruct archivists in a full range of advisable preservation actions short of laboratory treatment. They are not meant to be hard and fast rules, but rather represent the best practice for most situations. Common sense will reveal exceptions, as will archival judgements about the use, intrinsic value, condition, and space available for storage of the records being considered.

1. Reboxing Documents.

A. When placing records into acid-free archives boxes, care must be taken to neither overfill nor underfill boxes. If too many records are placed in a box, damage will occur as they are forced in and out. On the other hand, if there are too few records in a box, they will bend and slump, resulting in documents that are curved and distorted. Corrugated acid-free spacer boards should be used in partially filled archives boxes to keep records upright.

B. Records must be placed in boxes that are large enough to accommodate them without damage. Archives boxes in a variety of sizes and formats are available to meet the diverse storage requirements of archival records. Items that are too large for legal size archives boxes should be placed in half-suit boxes or an appropriate size box.

C. If an item is too large for a box, it should be placed flat on the shelf in an oversize storage area. A transfer sheet should be left in the file indicating the location and description of the oversize item.

2. Refolding Documents.

A. Records must be placed in acid-free file folders or envelopes that are large enough to accommodate them safely.

B. Folders and envelopes should not be overfilled, as records will not be properly supported and protected during handling and storage. The creases or score lines on a folder should be used as a guide to limit the number of items that can be safely placed within the folder. Preferably, the amount of material within a folder should be no thicker than the first crease and definitely no thicker than the width of the second crease, and the scored lines should be creased when the volume of material justifies it.

C. Unbound records that are currently stored in boxes without folders should be placed in acid-free file folders for support and protection. Material should also be removed from ring binders and placed in acid-free file folders. If a binder has some historical significance, it should be boxed at the end of the series.

D. Records should be unfolded and flattened. Letters and items within envelopes should be removed, unfolded, and stapled or clipped together with the envelope behind the top left-hand corner.

E. Typewritten folder labels should be used for most projects. Until permanent labels are affixed to the folder, the folder title should be written on the upper left corner of the folder in pencil or by pen using archival ink.

3. Written Notations on Archival Records.

A. No marks or information should be written directly on archival records without authorization by supervisors.

B. All authorized notations should be written in pencil as neatly and unobtrusively as possible, and should be enclosed within brackets to indicate that the information was added by the Library staff.

C. Only non-acidic and non-bleeding ink should be used to stamp archival records with the Ronald W. Reagan Library stamp, declassification notices or other markings.

4. Fasteners.

A. Acco fasteners, office-quality paper clips, rubber bands, bull dog clips, colored cloth tape, and similar devices should not be used to unite permanently valuable archival records. Many metal fasteners can rust, causing permanent staining and weakening of paper. Bulky fasteners, such as "bull dog" clips, can cause physical distortion of paper records and keep them from lying flat.

B. Non-corrosive, rustproof staples should be used in instances when paper records are strong and flexible, though they should not be

used on records of high intrinsic value or if the records are weak and brittle (such as records that are often copied).

5. Preservation Photocopying.

A. Highly acidic records (such as newspaper clippings and telegrams) should be copied onto archival bond paper or placed in polyester sleeves or within a folded piece of archival bond paper.

B. Valuable original records, such as documents containing Presidential handwriting, should be removed from the file. A copy of the item should be left in the file, and the original placed in polyester sleeve within a parallel file for valuable originals.

C. Photocopies made for preservation purposes should be made on electrostatic copy machines using archival bond paper. All copies should be stamped "Preservation Copy".

D. Caution must be exercised to ensure that records are not damaged, torn, or broken during photocopying.