



March 28, 2014

Mr. David S. Ferriero
Archivist of the United States
National Archives and Records Administration
Washington, DC

Dear Mr. Ferriero:

Thank you for extending the comment period for the proposed new National Historical Publications and Records Commission grant categories and for giving attention to the views of documentary editors. As you know, editors and the NHPRC have long been partners in the dissemination of primary sources critical to an understanding of the nation's past—a relationship that dates from the origins of what was originally the National Historical Publications Commission. The efforts of Julian Boyd, the founding editor of the Papers of Thomas Jefferson, and of other editors were crucial to making it possible for the Commission to begin granting funds for the support of editorial projects beginning in the 1960s. Since then, the NHPRC has been an essential source of support for many publication projects, and—through the summer Editing Institute and editing fellowships—for the promulgation and perpetuation of the definitions, principles, standards, and methods of quality historical editing.

It is no surprise, then, that members of the Association for Documentary Editing have taken an intense interest in the new grants program announced last month. I would like to take this opportunity to share with you some of the major concerns that editors have as they study the proposed guidelines for the two categories of grants for which documentary editions would qualify in the proposed program.

The draft Grant Program Description for Online Publishing of Historical Records states that any project funded under that program must include “an online edition that provides free access to the document collections.” Documentary editors have been preparing electronic files for publication for well over thirty years, and an early, leading-edge coding endeavor, the Model Editions Project, was propelled by editors. Several major editions can now claim the “born digital” label, and most editions have some online component now. Nor are documentary editors collectively opposed to open access—all of us want the personal reward of having our labors known and our work available to the broadest possible audience. The latest edition of the premier manual of best practices, the ADE-sponsored *Guide to Documentary Editing* by Mary-Jo Kline and Susan Holbrook Perdue, is now freely available online (<http://gde.upress.virginia.edu/>). The Association's peer-reviewed journal, *Scholarly Editing*, which publishes short editions as well as articles, appears only online, without subscription charge (<http://www.scholarlyediting.org/>).

And yet—for both the *Guide* and *Scholarly Editing*, there are costs that are either paid outright or are absorbed by someone to make that “free” access possible. Founders Online is pointed to now as an example of free access to documents. But Founders Online was only possible as a result of direct and

substantial financial subsidy by the NHPRC. Founders Online is also based on significant effort and expertise invested by the University of Virginia Press to create the Rotunda versions of the Founding Era editions' volumes; and investment before that by the Mellon Foundation and by subscriptions paid by institutions to create Rotunda as a source for top-rank digital scholarship; and huge investment before that by sponsoring institutions, funders, and university presses to the enormous task, over a span of decades that still continues, of creating the printed editions on which the entire enterprise is based. Must we mandate that only editorial projects with access to resources of that scale can receive NHPRC support? More thought should be given, too, to what free access means. If it means "without fees," would, for example, a website supported in part by certain categories of advertisements qualify?

Editors have expressed deep concerns also about the standards for editions, even the definition of what an edition is, in the guidelines for Online Publishing. According to the Grant Program Description, it will be possible to produce an "edition" that has no "contextual information" about documents, no annotation, no index—and in fact not even transcriptions. This presents the prospect that the NHPRC will fund online compilations of document images and call these collections editions. The guidelines for a project narrative in the Application and Submission Information for the online publications grant category uses such language as "*If you are transcribing records*" (emphasis added) and "*If you will be adding contextual information, annotation and/or indexing*" (again, emphasis added). The program description states that projects "*may apply*" (emphasis added) "for support to undertake more complex editorial work, such as document transcription and/or annotation." If transcription is optional and classified as "more complex editorial work," what is the minimum requirement to make a collection an edition?

In the section on "A Guide to Editing in a New Millennium" in the *Guide to Documentary Editing* (<http://gde.upress.virginia.edu/01A-gde.html#h2.11>), Mary-Jo Kline and Sue Perdue write that "Scholarly editors must set an example for other documentary publishers on the Internet by maintaining the truly transparent methods that have always been the hallmark of good editing." They go on to say:

To be frank, while almost anyone who wants to can now publish documents to the world, this does not mean that the results are an "edition" in any meaningful sense of the word. The ADE's Committee on Scholarly Editions offered these practical comments on what an electronic documentary edition is or isn't:

Simply rendering a text in electronic form does not constitute an electronic edition. The ADE-CES defines an electronic edition as primary source material prepared with

- 1) rigorous attention to the text,
- 2) explanatory annotation and
- 3) an explanation of the editorial practices used on the texts.

There can be an enormous range of practice within the field of documentary editing, but all share these main goals. Electronic editions require the same burden of scholarship as print and microform publications do, and because of their format, additional issues must be considered. ("Minimum Standards for Electronic Editions")

Those Minimum Standards for Electronic Editions, which the ADE issued as long ago as 2002, are available at http://www.documentaryediting.org/wordpress/?page_id=508.

It is unsettling to professionals that rather than emphasizing the know-how required to prepare a good documentary edition, the program for Online Publishing of Historical Documents seems to devalue editorial knowledge and skill. The guidelines for the new program do not say, as the previous guidelines for Publishing Historical Records program did, that the NHPRC "encourages using advisory boards as a source of special expertise." Instead, the guidelines actively encourage not special expertise but crowd-sourcing, especially for transcription of documents. Volunteer labor has

always been available to publications projects—an option used sparingly by many editors, or not at all. Initial transcription by inexperienced non-specialists does not save labor if it requires greater investment of skilled effort in textual verification than would be the case with paid, well-trained transcribers—or is the expectation that raw transcriptions by non-professionals will suffice for NHPRC-supported online editions? Surely we do not want to go down that road. While volunteer involvement can have some place in historical editing, depending on circumstances, it would be alarming for a leading federal agency to feature crowd-sourcing in its grant guidelines instead of staying silent on that point and emphasizing, instead, support for projects to employ the skilled professionals on which scholarly research in every field has always relied.

Making key components of an edition such as annotation and even transcription optional, omitting any reference to standards required for an edition, appearing to devalue the skills, experience, and training required to produce acceptable work, and making grants in the Online Publishing of Historical Documents available to work that previously would have been classed as archival projects rather than publications: these factors, taken together, point to the conclusion that the NHPRC is not just ceasing to fund print-only publication. It will in fact cease to fund documentary editions as editing professionals have defined them. Under the new policy, there is no assurance that the Commission will, before long, be supporting any editing projects at all. This appears to be the likely result if the emphasis is on cost and on the sheer quantity of documents made available online.

- The ADE asks that editorial projects and projects which are based on the publication of digital surrogates (without the attributes that define an edition) be separated within the Online Publishing of Historical Documents grant program. Recognizing these types of projects as different versions of online publishing will allow the application of appropriate definitions and standards for each of them in the guidelines. This modification could help ensure that funding for editions according to established standards, in keeping with the support that the NHPRC, since its inception, has given to edited documentary publications, can continue. Careful definition of editorial projects would also be in keeping with the current grant programs of the National Endowment for the Humanities, where Scholarly Editions and Translations are given their own category and prospective applicants are advised to “demonstrate familiarity with the best practices recommended by the Association for Documentary Editing or the Modern Language Association Committee on Scholarly Editions.” We also ask that the published grant guidelines say nothing about crowd-sourcing for editorial projects, allowing project directors to continue to make decisions about how performance objectives will be accomplished.

Another area of concern is permanence—or at least longevity—of online products. This issue has received considerable attention in the world of digital humanities (the ADE devoted a panel session to it at the Association’s last annual meeting). The dynamic qualities of digital information, for all the boon they provide to users, require long-range upkeep. The NHPRC’s draft guidelines expect editions to last well beyond the projects that create them, but there is no consideration for how digital longevity will be supported in terms of server space, maintenance of digital platforms, and potential conversion of software, tags, or content to meet future changes. Those issues are not insoluble, but if the Commission intends to place such emphasis on online publication—and to prohibit subscription fees that could provide ongoing support—shouldn’t there be means in place to ensure long-term preservation and use of the editions?

Similarly, the Transition Support program seems insufficient to provide the means for current print-only editions to mount free-access online components. Smaller projects with limited resources will rely on the NHPRC to find and subsidize, if not provide directly, access to stable long-range platforms, knowledge, training, standards, and technical support. Even when such resources are available, projects may be constrained by contractual obligations to publishers and funders, or by arrangements with sponsoring institutions, from having non-subscription online access in place by 2018. Rather than decreeing the end of print-only publications by a certain date, can the NHPRC not continue to give strong emphasis to online publication while still allowing the possibility of other

publication options? Online, free-access publication may not be the ideal option in every case, yet the NHPRC is ready to close the door on even the theoretical possibility of other choices.

- We ask that the requirement of free online access in both the Online Publishing and the Transition Support categories be held in abeyance until the NHPRC can study the issue and develop a practical, robust, proactive approach to developing best practice and taking responsibility for achieving this goal. In the meantime, the grants program can continue to encourage and assist editorial projects in creating online editions.

While not doing so explicitly, or perhaps even consciously, the proposed grant programs embody the end of the role of publishers in documentary editions. Modern editions of American historical documents, modeled on the example of the Jefferson Papers project conceived by Boyd in 1943, have relied on three partners: a sponsoring institution, at least one source of funding, and a publisher. Academic presses, which are far more than just printing shops, have invested expertise that has made editions more usable and the information in them more accessible through design choices, indexes and other apparatus, and guidance and requirements based on centuries of experience in presenting information to users efficiently and effectively. They have solved the long-term durability issue for printed volumes through demanding standards of acid-free materials and production techniques. And they have been able to recover, through the sale of volumes, some of the costs of the value they have added to editions. Academic publishers are adapting to the online environment, but as the Rotunda example demonstrates, there has to be provision, through subsidies and possibly subscriptions, to pay for the value added by publishers or their equivalents. There is no such provision in the proposed NHPRC grant structure, or recognition that someone has to play that role in the publication of editions, in any format.

- The ADE urges the Commission to consider that debates over the fate of print publication are ongoing, and that the goal of broad digital access to historical sources does not require that all other options for dissemination should be removed from consideration. We should also consider, together, the contributions that scholarly publishers have made and will continue to make as partners with editors, sponsoring institutions, and funders to carry forward our essential work.

I am aware that time may not allow for prolonged consideration of the issues that I have outlined above, if the new programs are to be in place for the FY2015 grant cycle. It is unfortunate, also, that the Digital Citizen and American Record report is not available. I am confident, however, that the changes editors would like to see in the proposed Online Publishing of Historical Records and Transition Support grant categories cannot run contrary to the intent and direction of that report, if the goal is making the American Record available to the public. That has always been, and will always continue to be, the goal of all documentary editors.

Editors have long worked to educate legislators and public about the importance of the NHPRC's role in providing access to the historical record. I hope that we can continue to work in unison to increase appropriations for the grants program and make it possible for the Commission to support a diversity of types of projects.

Best regards,

James P. McClure
President, The Association for Documentary Editing
General Editor, The Papers of Thomas Jefferson, Princeton University

cc: Kathleen Williams
Lucy Barber