

A NEW ERA in federal record-keeping will officially begin Sept. 27 when the Privacy Act of 1974 goes into effect. The law gives citizens the right to inspect many kinds of government files about themselves, and sets down strict rules for the collection, use and exchange of information about individuals. The principles involved—accuracy, relevance, fairness and need-to-know—are elementary. But applying them to the great volume and variety of federal records has proved to be, as expected, quite a monumental task.

The part of the law that has generated the most work and grumbling in many agencies is the requirement for full disclosure of the nature of all files involving individuals. This provision, in effect an annual public inventory of the government's information stock, was enacted because Congress found that nobody knew the full extent of federal record-keeping about citizens. Some agencies were maintaining secret files and concealing some abusive practices from Congress and the public. The broader difficulty, however, was simply that the government's data demands had grown so fast, and had been answered in so many uncoordinated ways, that not even the agencies themselves had a firm grasp of all their information practices.

The inventory is now nearing completion. The results are staggering, to put it mildly, even to those who have long suspected that the government has a file on everything. So far, over 8,000 records systems have been summarized in fat volumes of the Federal Register totaling 3,100 pages and more. The entries range from the controversial to the commonplace. There are listings for the sensitive files of the Defense Investigative Service; for records of the participants in National Security Council meetings since Jan. 20, 1969 (classified "SECRET"); for HEW's roster of licensed dental hygienists; for the Agriculture Department's list of people interested in forestry news, and for the Export-Import Bank's roster of employees who want parking spaces. There are outlines of huge computerized networks such as the Air Force's Advanced Personnel Data System, summarized

in 11 columns of small print; there are earnest entries for little lists such as the key personnel telephone directory of the Administrative Office, Assistant Secretary of Defense (Intelligence)—a roster kept, according to the Aug. 18 Federal Register (Part II, section 1, page 35379), on "8 x 10½ Xerox plain bond sheets."

The huge pile of records of records and lists of lists may seem to reach new heights of regulatory overkill. Indeed, there are bound to be jokes and complaints about the agencies that keep so many files—and about the Congress that required such detailed, indiscriminate reports. But such an inventory, however tedious to prepare—and however trivial parts of it may be—is a useful and necessary step. For the first time, the awesome range of government records has been catalogued. For the first time, all agencies have been compelled to define what they collect on individuals, how the materials are used, who has responsibility for what, and which records, primarily in law enforcement fields, are so sensitive that they should be withheld from inspection by the citizens involved.

The catalogs and related agency regulations merit scrutiny on a number of grounds. Many citizens will no doubt want to inspect various records on themselves. Congressional committees and interested groups in many fields may wish to challenge some uses of data and some exceptions from disclosure, notably the extensive withholding proposed by the Justice Department on law enforcement grounds. Congress may now be able to sharpen the focus of the Privacy Act and modify the reporting requirements for mundane records systems such as internal telephone lists. And federal administrators, given some time to review their reports, may well start questioning some of their offices' data-collecting practices and weeding out their files. Indeed, it is quite possible that some bureaucrats, faced with the chore of cataloguing marginal or redundant files, may have already employed a very unbureaucratic strategy: throwing some records out. If that has happened even in one agency, the Privacy Act has already done some good.