ELECTRONIC RECORDS MANAGEMENT/ MIGRATION

A Guideline of the Utah State Archives and Records Service

System design considerations adapted from Arizona State Library, Archives, and Public Records, ***System Design Considerations***

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Purpose: The Government Records Access and Management Act (Utah Code, Title 63G, Chapter 2) and the Public Records Management Act (Utah Code, Title 63A, Chapter 12) impose obligations to retain, manage, and provide access to state government records for the duration of their legal retention periods. In order to meet these requirements, recordkeeping practices need to be integrated into systems.

The core requirements for managing records in an electronic environment are:

- Accessibility—the records must be available for appropriate use for the duration of the retention period.
- Authenticity—the records must be what they claim to be and have integrity, that is, have not been changed, deleted, or otherwise altered.
- Reliability—the data within the records is at all times retrievable (i.e., no loss of data).
- Secure—all of the people authorized to access records according to the classification of the records, and only those people, should have access.

In addition, the systems must be trustworthy, with the hardware, software, and processes to manage the electronic records reasonably secure from misuse and intrusion.

It is important to build records management into systems. The involvement of the records officer in the design of systems is essential to ensure that records meet legal mandates. Records officers should work with their IT professionals to ensure that systems can capture and maintain records, store records securely, provide access to those who are authorized, preserve essential and historical records and destroy obsolete records when they have met their legal retention period.

Systems with no record management requirements put at risk valuable records that protect the rights of citizens, provide evidence of government accountability and document specific and significant government historical events. Not incorporating recordkeeping requirements has allowed records that need to be destroyed to be kept longer than required. The cost of managing

and storing these records places an unnecessary financial burden on valuable and scarce public funds as well as adding liability in increased exposure in litigation.

SYSTEM CONSIDERATIONS

Here are some recordkeeping requirements to consider when developing a system:

1. What records need to be created or kept that document the agency's functions/activities in the system:
    a. What is necessary to capture?
    b. Who will rely on the information?
    c. Will it be necessary to provide a fixed record of what was relied on to make decisions by the agency?
    d. Will it be necessary to provide a fixed record of what was relied on to make decisions by the agency's stakeholders or the general public?
    e. How will the information be verified for authenticity, completeness and accuracy before it is captured into a fixed record?
    f. Is an outside contractor being used [e.g., to receive inputs from stakeholders that are then converted to be ingested into the system], if so:
        i. Will inputs need to be captured as received from the stakeholders?
        ii. How will the information be verified for authenticity, completeness and accuracy before it is captured into a fixed record?
        iii. How long will records being received and created by the contractor need to be maintained and accessible?
        iv. All recordkeeping requirements should be documented in the contract with the contractor.
2. What will be required to supply appropriate content, context and structure of the records before the records are captured in a fixed method:
    a. Are there automated tools that can be integrated to provide date of creation/receipt; owner; classification information as the type of record [draft, version #, final official record, duplicate copy], records series [to be able to link the records to their retention periods and to other salient records related to the same business activity], and access restrictions [including the ability to redact restricted information from the records when required by an open records request]; and other metadata that will enhance the retrievability of the records [such as appropriate and approved keywords found in the agency's official thesaurus]?
    b. What will be necessary to ensure a smooth transition when the records are migrated to another system?
3. How will these records be captured so they are fixed?
4. If retention periods for the records change, how will the new retention period be transitioned into the system?
5. What is the business practice module that will create rules for the management of other data:
    a. Are specific data fields utilized by more than one business process requiring control by more than one retention period?
6. How will records be maintained through the retention period:

a. How will the records be protected from unauthorized access?
b. How will the records be maintained to provide authorized access:
    i. How will copies be provided in response to open records requests?
    ii. How can sensitive data within the records be protected or redacted if needed?
c. How will the records be protected from unauthorized destruction?
d. If there are plans to move records near-line or off-line, what protocols will be built in to ensure that the media is refreshed and the bit error rate is corrected on a regular basis?
e. What indexing systems will be used to ensure the records are accessible?
f. What migration strategies will be in place to regularly replace the media and to refresh the data?
g. What migration strategies will be used to convert the records without loss or corruption to the next version or another system?
h. What will be the backup strategy used for the system:
    i. How will the strategy provide business continuity/vital records protection?
    ii. How will the strategy provide for the reliability and integrity of the records should a server crash or if a security violation occurs?
    iii. How will the strategy provide for times when the system is down:
        1. How will the records be available?
        2. How will new records be captured?
        3. How will captured records be put into the system after it is back up and running?
    iv. How will the strategy provide for the deletion of records once their retention period has lapsed, even on backup media?
i. What records will need to be created for audit purposes within the system:
    i. Will the system need to record who captured, retrieved or deleted records and when?
    ii. Will the system ensure the appropriate metadata is maintained with the records for the entire length of the retention period?

7. How will any downloads of data be managed so that renegade standalone systems are not created without the proper recordkeeping requirements attached to them?
8. How will records be deleted from the system when their retention period has lapsed:
    a. How will the agency ensure that deletion does not impact other records that should be retained?
    b. Will the agency want to delete all associated metadata when the records are deleted, if not, what will need to be retained and for how long?
9. How will records be protected from deletion when there is a hold on destruction?
10. How will the records with permanent retention be preserved and accessible over time:
    a. How will permanent records be transferred to the State Archives in a way that documents the data structure?
11. What system documentation will need to be created to document recordkeeping processes?

12. What training will be provided to users to ensure they are aware of their recordkeeping responsibilities?[1]

FURTHER CONSIDERATIONS

Many technological options already exist that can be utilized and/or integrated into systems. These options adhere to recordkeeping standards and can save the expense of developing new tools. The Utah State Archives can provide guidance on these tools.[2]

[1] System design considerations adapted from Arizona State Library, Archives, and Public Records, *System Design Considerations,* ***http://www.lib.az.us/records/GuidanceAndRelatedResources/systems_design_consideration.aspx***.
[2] See: Utah State Archives, *Electronic Records Management Business Case, 2008,* ***http://archives.utah.gov/recordsmanagement/ERM/ERMBusinessCase.pdf***.