

“Scanning and Tossing”

Imaging Requirements for
Paper Based Records

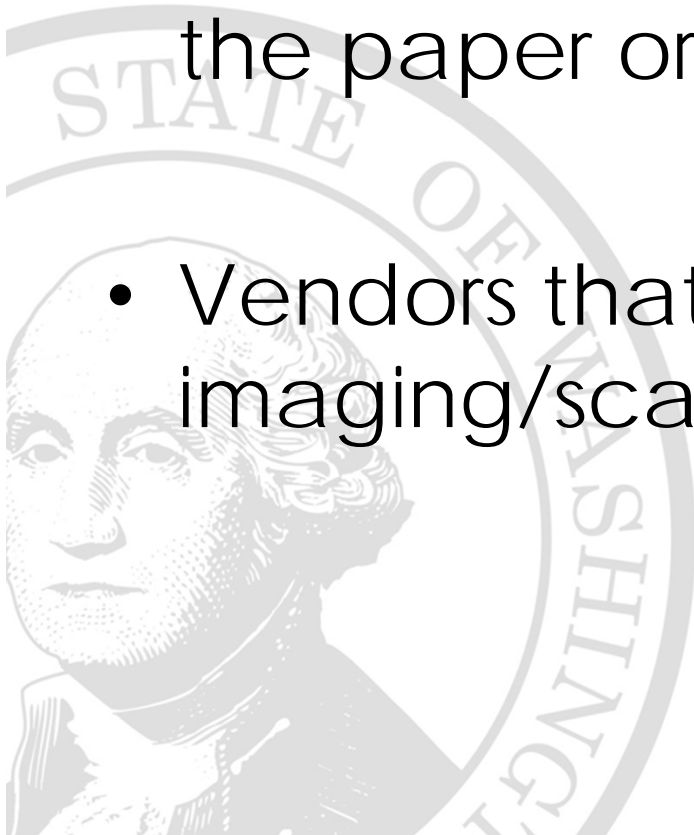
Overview

- Our office wants to “go paperless”!
- Can I scan and toss?
- What are the rules and requirements about imaging?
- What are the rules and requirements about getting rid of the paper?



Who should know “scanning and tossing” requirements?

- Public agencies that want to scan paper based records and then destroy the paper originals after imaging
- Vendors that are contracting for imaging/scanning projects



"Going paperless"

Does NOT mean simply tossing the paper based copies after scanning

If you are still creating paper based

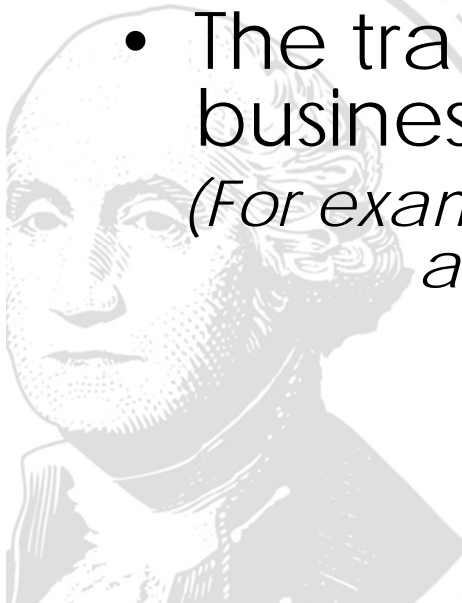
records as part of your business process,

you are not "going paperless"



How do I “go paperless”?

- Going “paperless” is developing completely electronic processes from start to finish
- No paper copy is generated, no hard copy signatures required for authority or execution.
- The transactions and execution of business is all done in a digital format
(For example: using e-forms, electronic web-based applications, databases, electronic approvals/signatures)



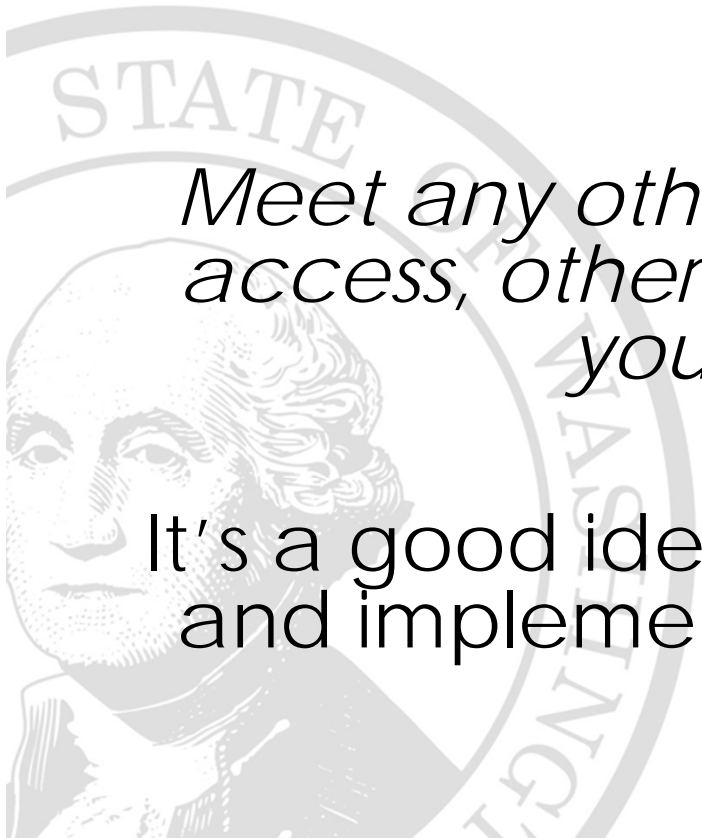
Do some planning when you do "go paperless"

You can absolutely do business completely electronically (born digital) as long as you follow retention and disposition requirements

and

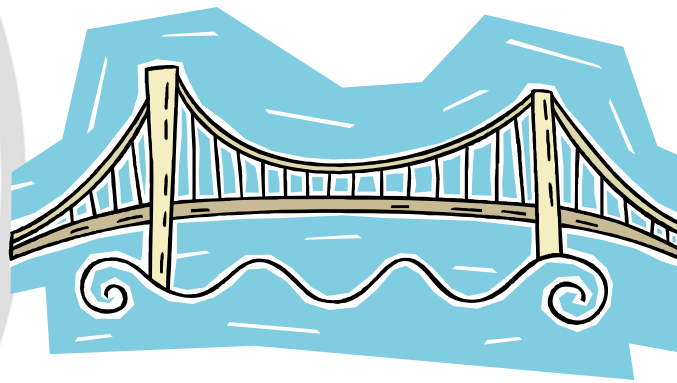
Meet any other requirements (legal, audit, access, other regulatory) as necessary for your agency business

It's a good idea to document the decisions and implementation of "going paperless"



Bridging the gap

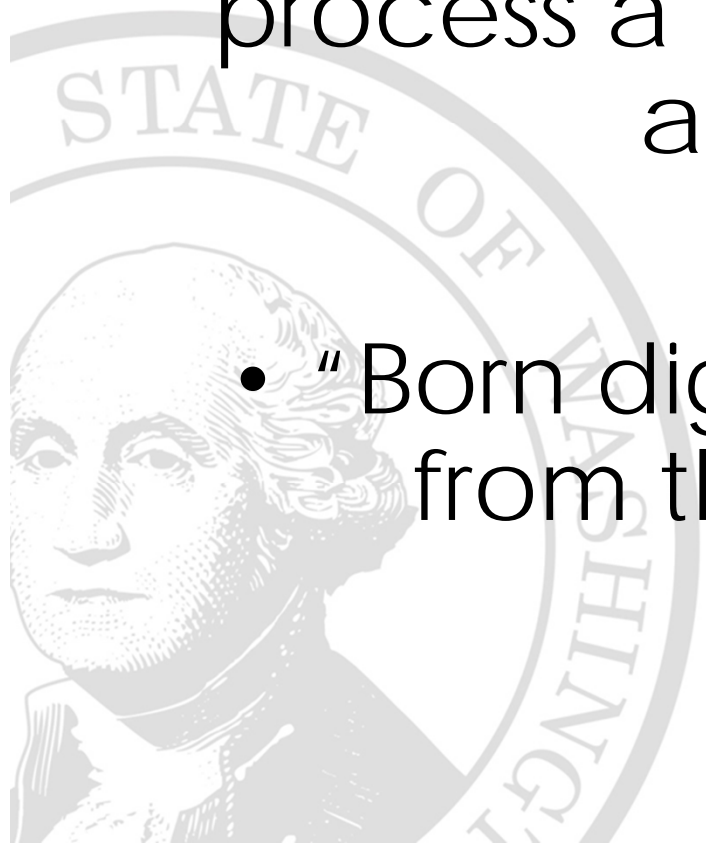
- Still have paper-centric processes
- Want to transition from hybrid to completely electronic



Born Digital vs Digitization

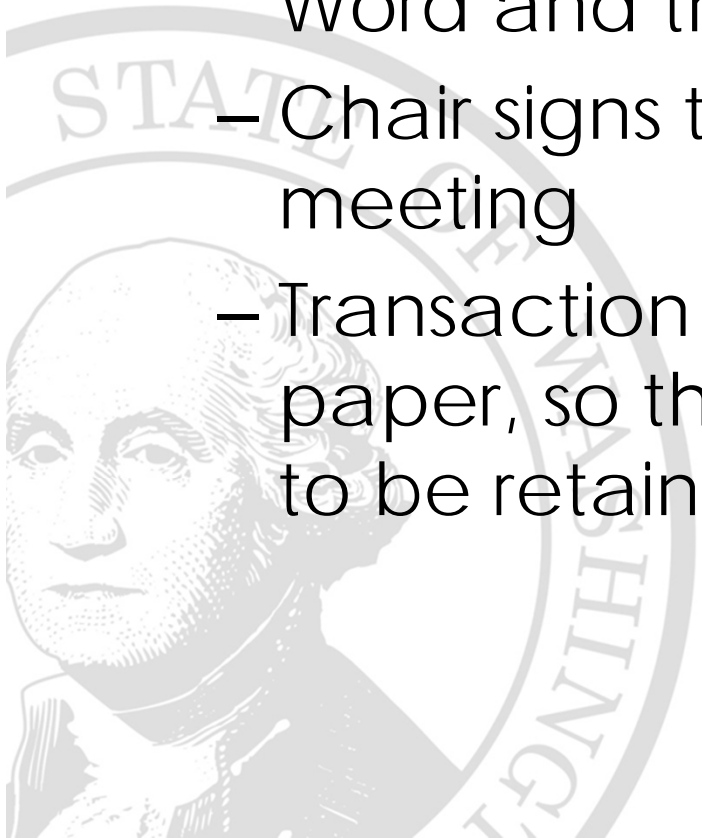
- Imaging or digitizing is CONVERTING through a physical process a paper based record to a digital format

- “Born digital” means created from the beginning using software



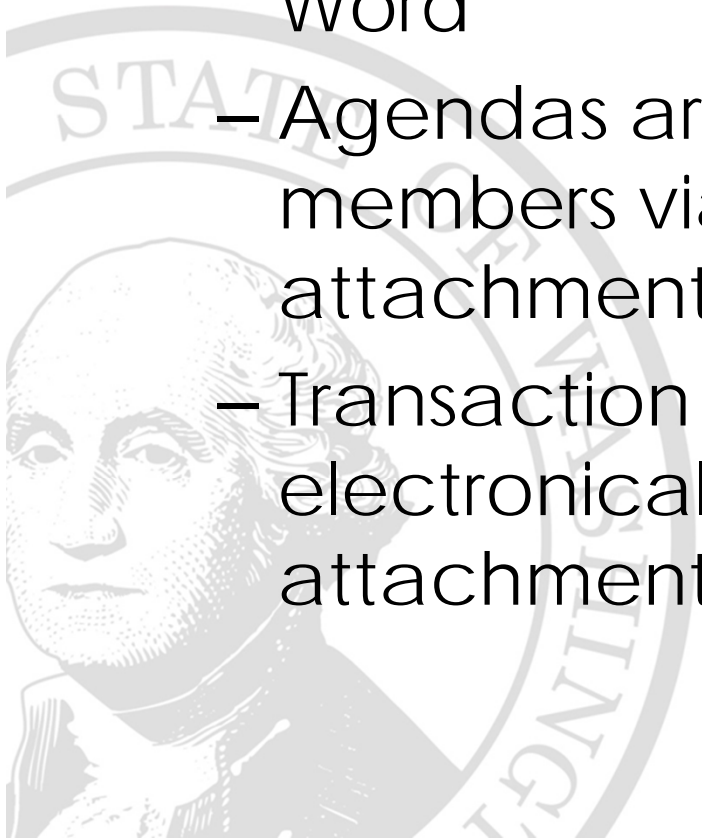
What is “Born Digital”? #1

- Board minutes are drafted using Microsoft Word and then printed
- Chair signs the printed minutes at the next meeting
- Transaction of public business occurs in paper, so the signed paper minutes need to be retained



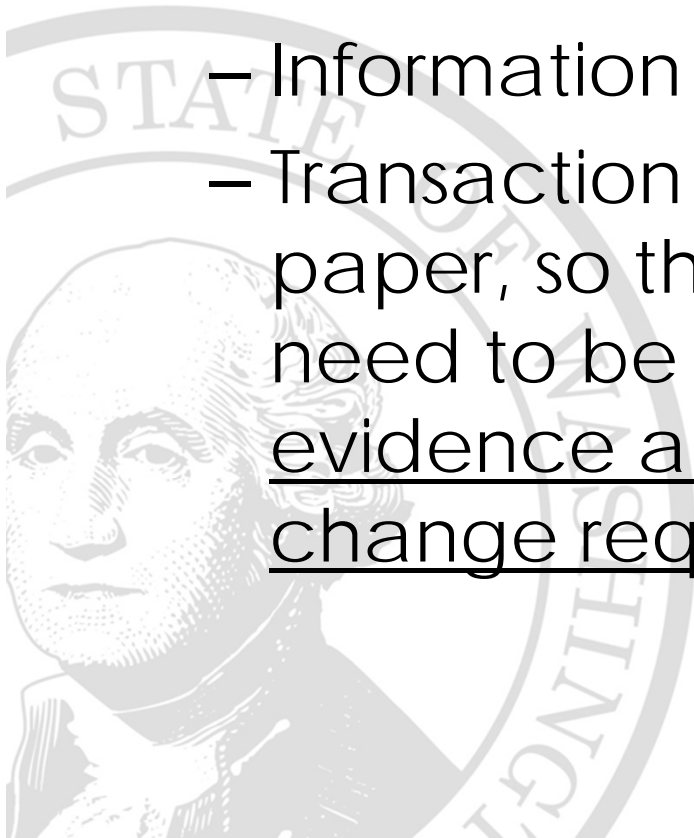
What is "Born Digital"? #2

- Agendas are drafted using Microsoft Word
- Agendas are distributed to Committee members via email with the Word attachment
- Transaction of public business occurs electronically, so the sent email (including attachments) needs to be retained



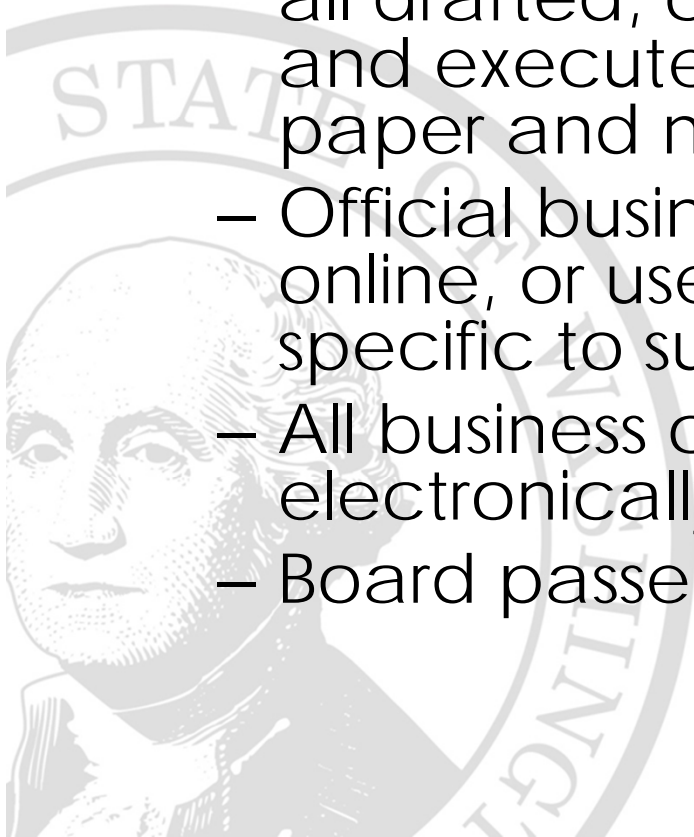
What is "Born Digital"? #3

- A request to change a student's address is submitted in hard copy to the school
- Information is transcribed into database
- Transaction of public business occurs in paper, so the submitted hardcopy record need to be retained – that form is the evidence and the authority to make the change requested



An example

- A local school board “goes paperless”
 - Meeting arrangements, agendas, drafts of minutes, approval of minutes, resolutions are all drafted, circulated, accessed, approved and executed without printing out of any paper and no hard copy signatures required
 - Official business is all conducted via email, online, or use of a software applications specific to supporting boards and meetings
 - All business captured and supported electronically (NO PAPER IS USED)
 - Board passed resolution to do so



There is still a LOT of paper!



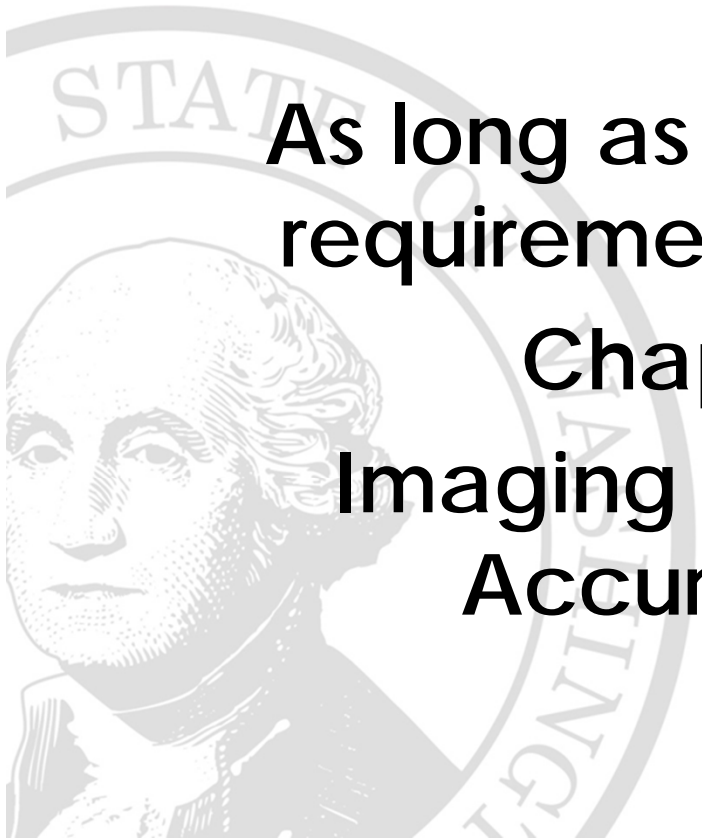
Can I scan and toss paper-based records?

Absolutely – with conditions!

As long as you meet the rules and requirements in accordance with

Chapter 434-663 WAC

Imaging Systems, Standards for Accuracy and Durability



You can't "just do it"

"Conversion to an imaging system does not automatically authorize the destruction of the source documents for which images have been created..."

WAC 434-663-600



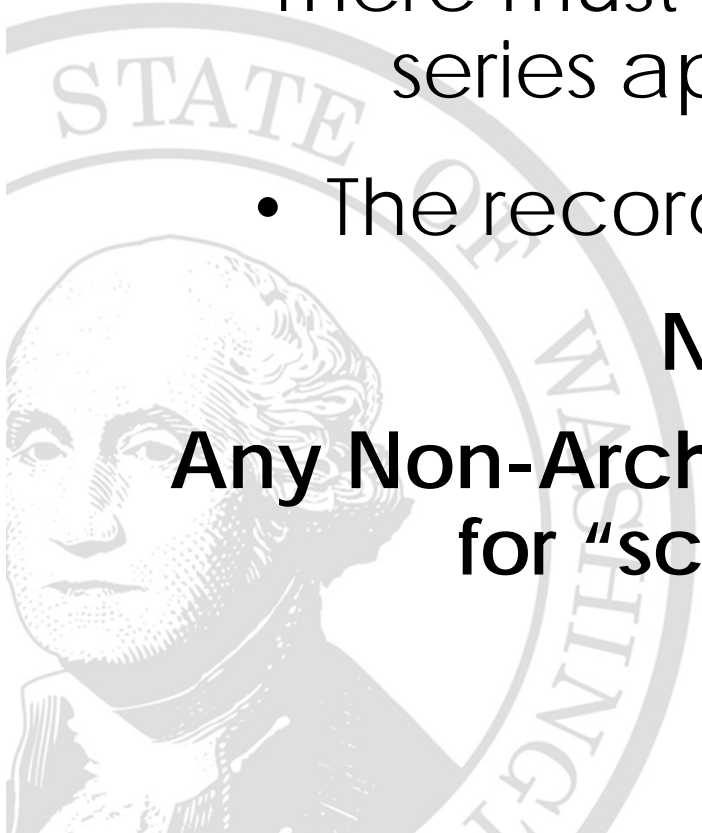
What you need to know first

Paper-based source records must be *eligible for destruction*

- There must be an appropriate records series approved for agency use
 - The records must be designated as

NON-ARCHIVAL

Any Non-Archival record series is eligible for “scanning and tossing”



Where do I find out if records are NON-Archival?

All approved retention schedules will note if records have a “Non-Archival” or “Archival” designation:

DISPOSITION AUTHORITY NUMBER (DAN)	DESCRIPTION OF RECORDS	RETENTION AND DISPOSITION ACTION	DESIGNATION
GS2012-017 Rev. 0	<p>Franchise Requests – Declined</p> <p>Records relating to franchise request proposals <u>submitted to</u> or <u>requested by</u> the local government agency where the request is not granted. Includes review, development, negotiations, and related communications.</p> <p>Excludes franchises granted <u>by</u> the agency, which are covered by GS50-05A-10.</p> <p>Excludes franchises granted <u>to</u> the agency, which are covered by GS2011-169.</p>	<p>Retain for 6 years after request declined <i>then</i> Destroy.</p>	<p>NON-ARCHIVAL NON-ESSENTIAL OPR</p>
GS50-05A-10 Rev. 1	<p>Franchise Requests – Granted by Agency</p> <p>Records relating to franchise agreements <u>granted by</u> the local government agency allowing the use of public streets, bridges or other public ways, structures or places above or below the surface of the ground, for the provision of public services (such as utilities [gas, electricity, water, sewer, etc.], railroads, telecommunications, and other activities) in accordance with <u>RCW 35A.47.040</u> and/or <u>RCW 80.32.010</u>. Includes review, development, negotiations, final agreement and related communications..</p> <p>Excludes franchises granted <u>to</u> the agency, which are covered by GS2011-169.</p>	<p>Retain for 6 years after termination or withdrawal of franchise agreement <i>then</i> Transfer to Washington State Archives for permanent retention.</p>	<p>ARCHIVAL (Permanent Retention) ESSENTIAL OPR</p>



Archival Records are NOT to be destroyed!

An agency may scan any archival record and then **contact the Archives for appraisal and possible transfer** of either the paper originals or the digital version or both!



Archival Records are NOT to be destroyed!

The archivists will do an appraisal to determine if they want either one or the other or both to be included as part of the Archives collections for preservation.

For certain records, there is an intrinsic archival value to the paper it is on with a signature or seals affixed. For other archival records the value is in *the information* itself, not piece of paper it is captured on what it is contained within (i.e. database)

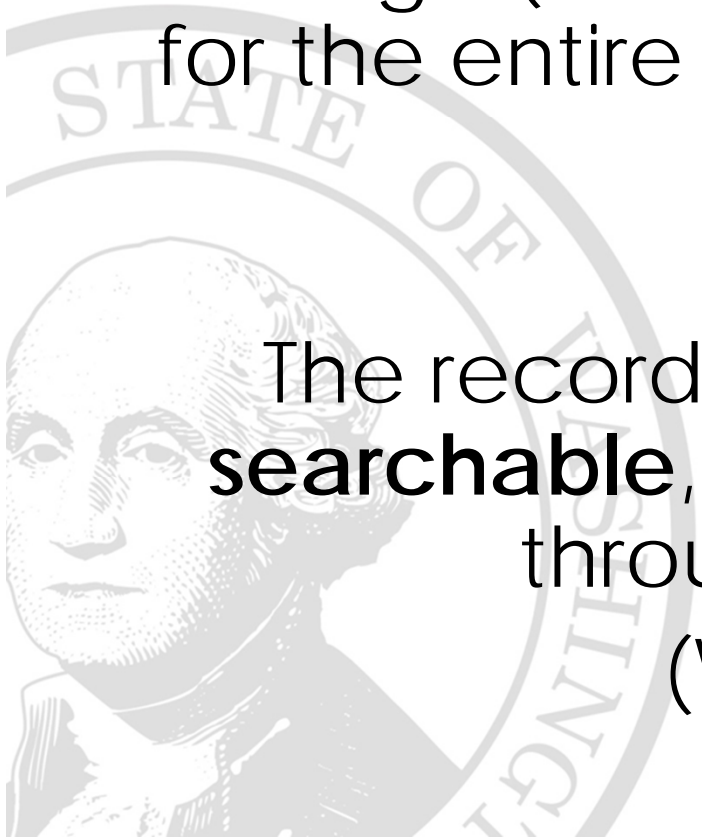


Preservation of Electronic Records

If you are replacing a paper record with a scanned image, you must maintain that image (and any indexing information) for the entire minimum required retention period.

The records must remain **readable, searchable, retrievable, and authentic** throughout that period.

(WAC 434-662)



Let the imaging begin

The imaging process should be guided by requirements in WAC 434-663-325 :

Capture a complete and accurate image of each source document

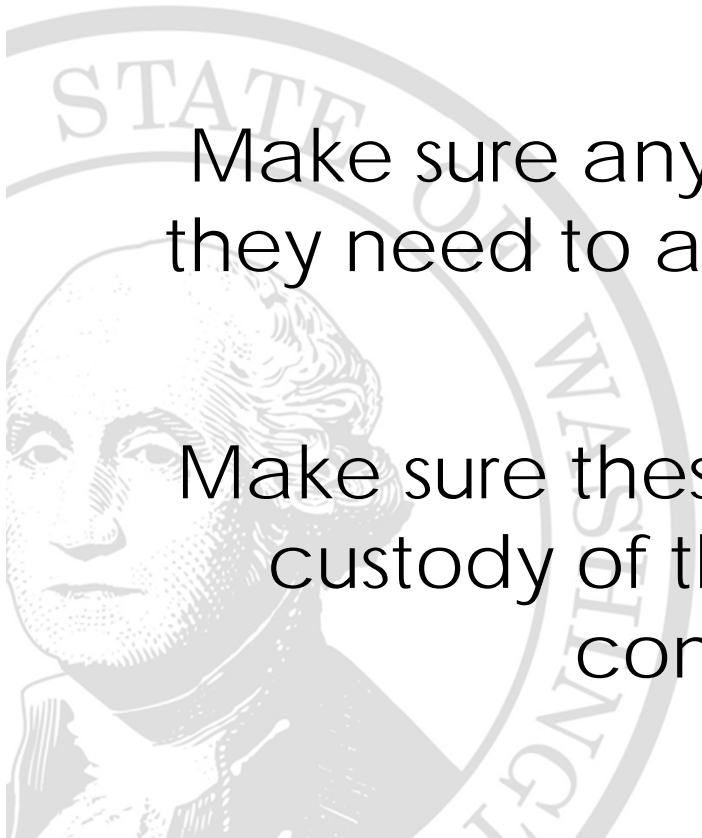
It is critical that an agency **develop and document written standards and consistent processes for imaging** so that everyone is doing it the same way, all the time, again and again...

Vendors need to know

Chapter 434-663 WAC requirements apply to images produced on behalf of agencies by **vendors**, too!

Make sure any vendor you are using knows they need to abide by these same rules and requirements

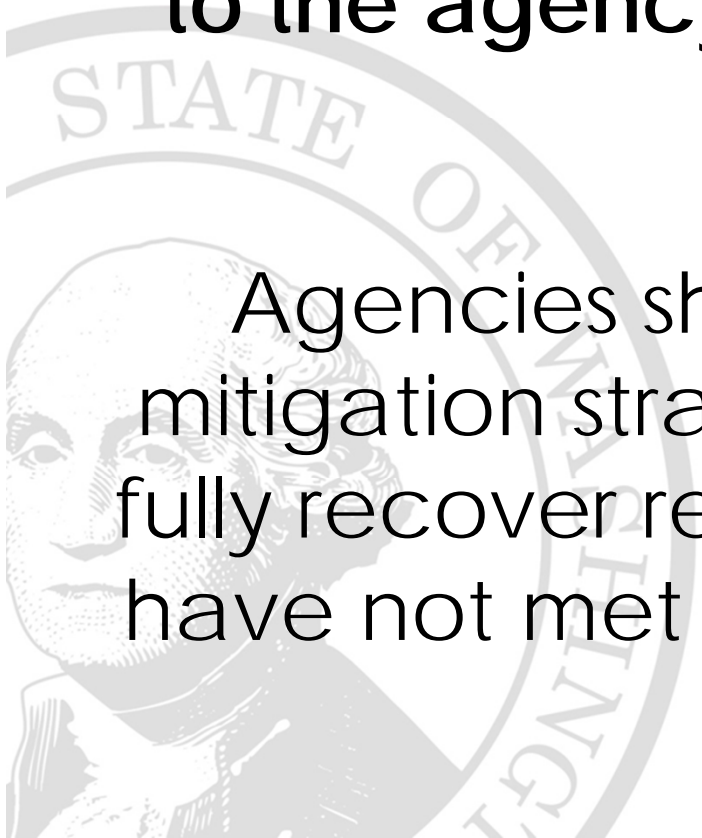
Make sure these obligations, including legal custody of the records, are included in contract negotiations



Just in case...

If the contract terminates, all imaged records and metadata must be **returned to the agency in an accessible format**

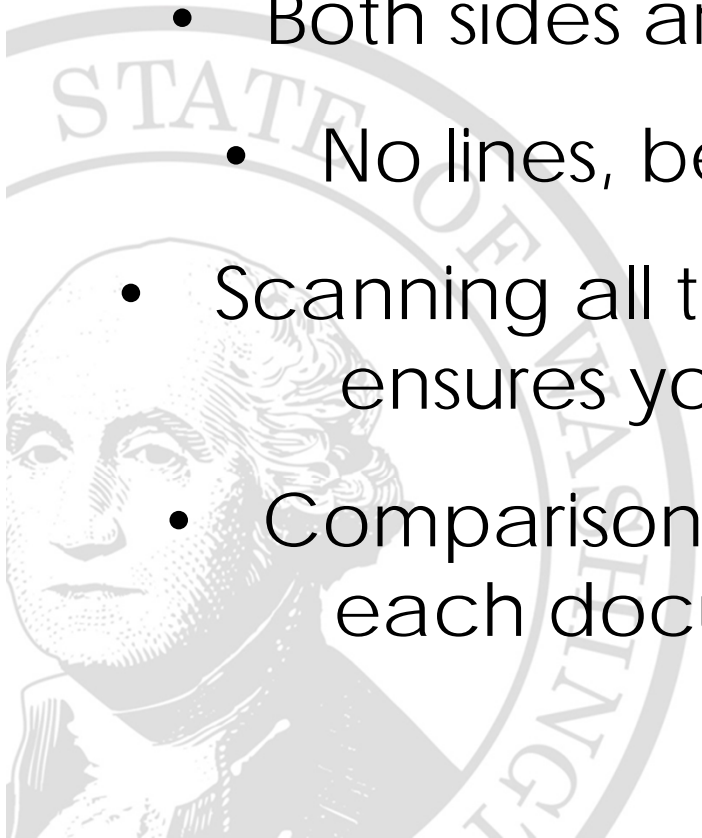
Agencies should apply appropriate mitigation strategies to ensure they can fully recover records and metadata that have not met required retention periods



Quality Control

Quality control needs to start at the **beginning** to ensure complete and accurate capture:

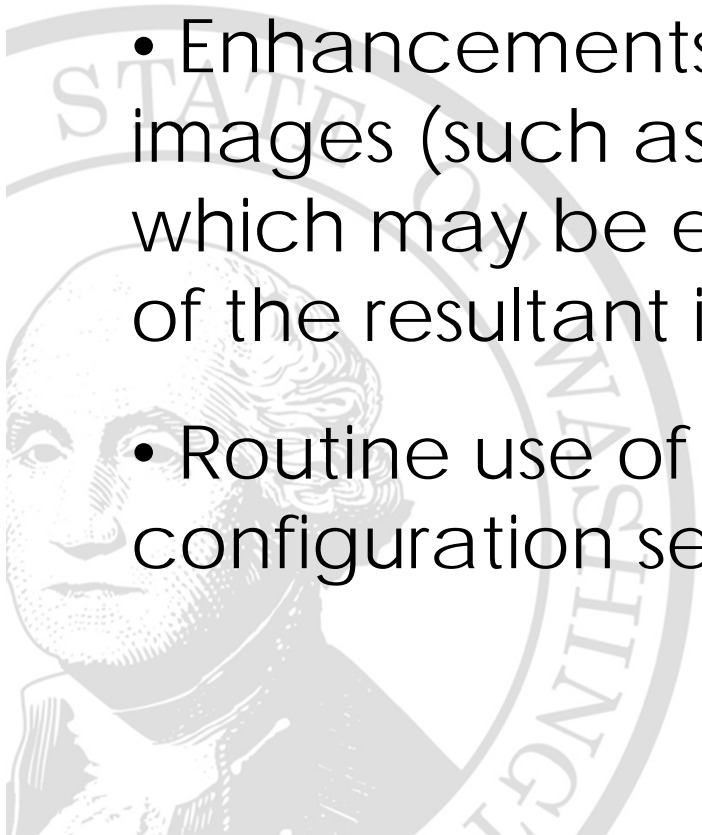
- Both sides are captured if double sided
- No lines, bent pages or bent corners
- Scanning all textual documents at 300 dpi ensures you are meeting minimums
- Comparisons (individual visual check of each document or batch checks?)



More QC

Specific quality control procedures may include, but are not limited to:

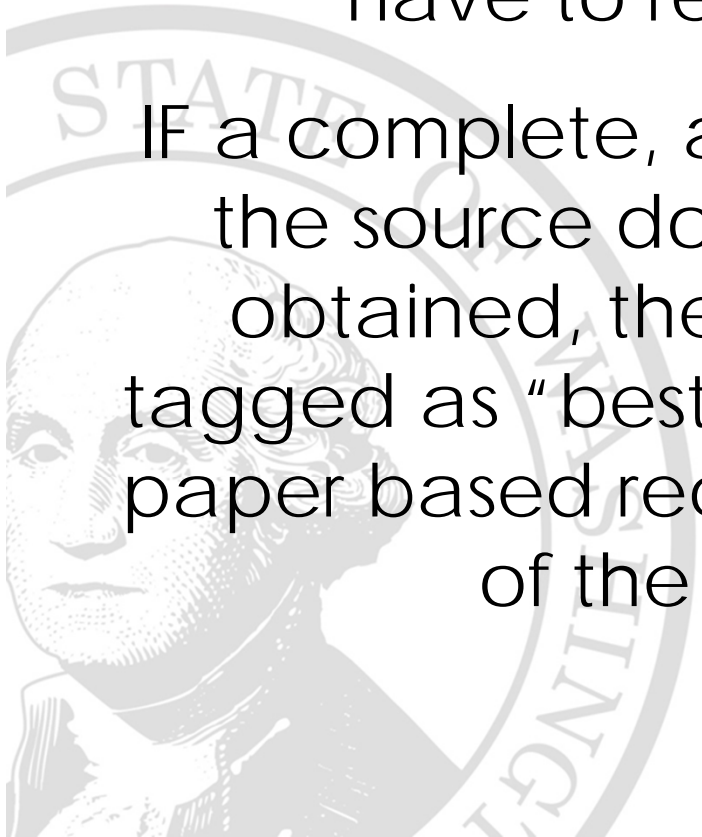
- Enhancements or other manipulations of the images (such as de-skew, de-speckle, etc.) which may be employed to improve the quality of the resultant image
- Routine use of scanning targets to verify configuration settings



Check and check again

Periodic checks that the indexing/metadata is appropriate and accurate. You do not want to have to re-do thousands of images!

IF a complete, accurate and legible capture of the source document's content cannot be obtained, the image should be labeled or tagged as "best scan possible" **AND** the original paper based record must be kept for the length of the retention requirement



Format can matter

Records with **total retention requirements*** of **6 years or fewer** can be imaged with an acceptable **lossy or lossless** format, including PDF, PDF/A, JPEG, or TIFF

**Read the full retention requirement – certain cut-offs will actually add years to the total required retention. For example, contracts and agreements you keep for 6 years, BUT the trigger or cut-off to start the retention clock may not kick in for a decade or more*

Long term records and imaging

Records with total retention requirements **longer than 6 years** must be scanned using a **lossless** data compression format (e.g. *TIFF Group 4, PNG, or GIF*)

Must consider long-term stability of the technology to ensure sustainability and searchability of the images

Predicting the future

Planning for future access requires making choices based on stability and longevity

Remember when?

Cassette tapes

8 track tapes

CD's

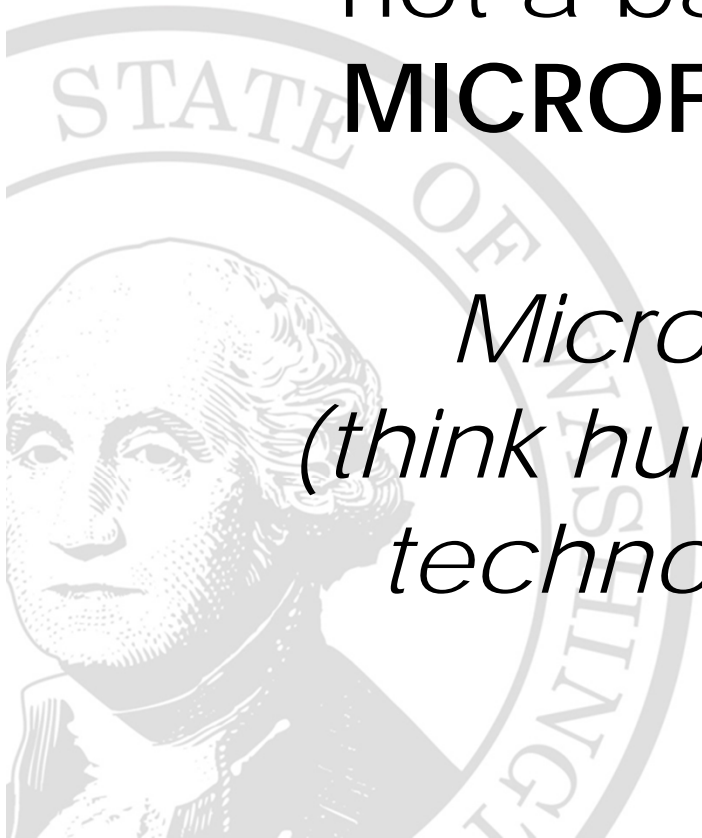


Insurance policy

For certain long-term records, it is not a bad idea to consider

MICROFILM (*yes, microfilm*)

*Microfilm is very stable
(think hundreds of years) and
technology-independent*

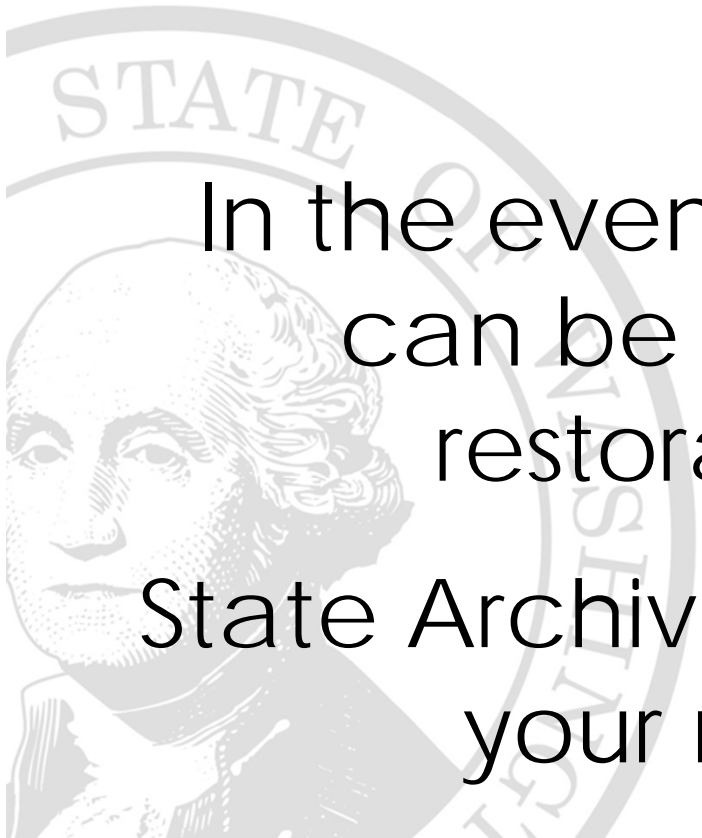


Images and film

Microfilm can be generated easily and economically from scanned images

In the event of a disaster, images can be written from film for restoration and access

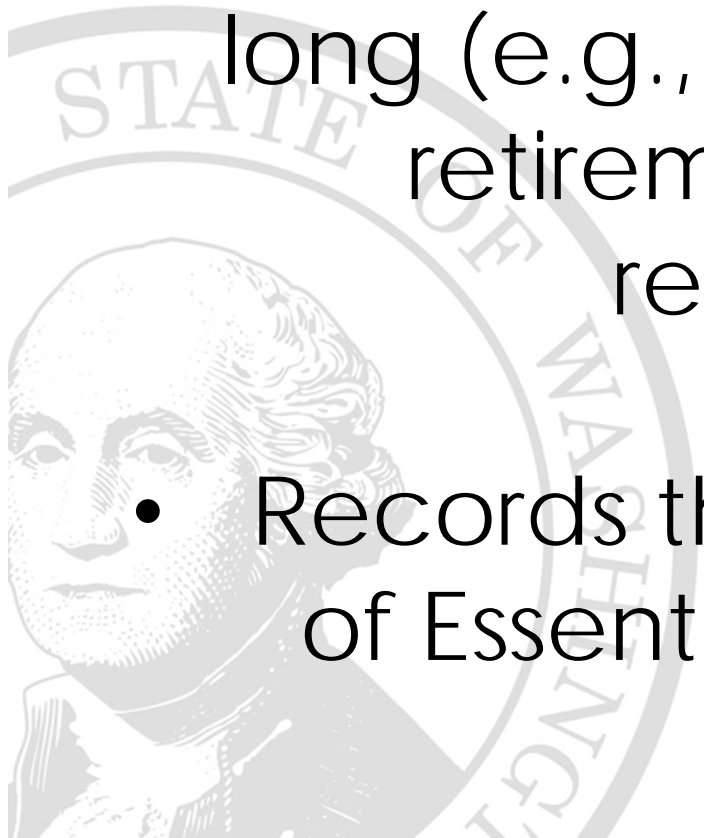
State Archives will inspect and store your microfilm for free



Good candidates for microfilming

- Records with a **total required retention** that is several decades long (e.g., payroll records to verify retirement, official student records, as-builts)

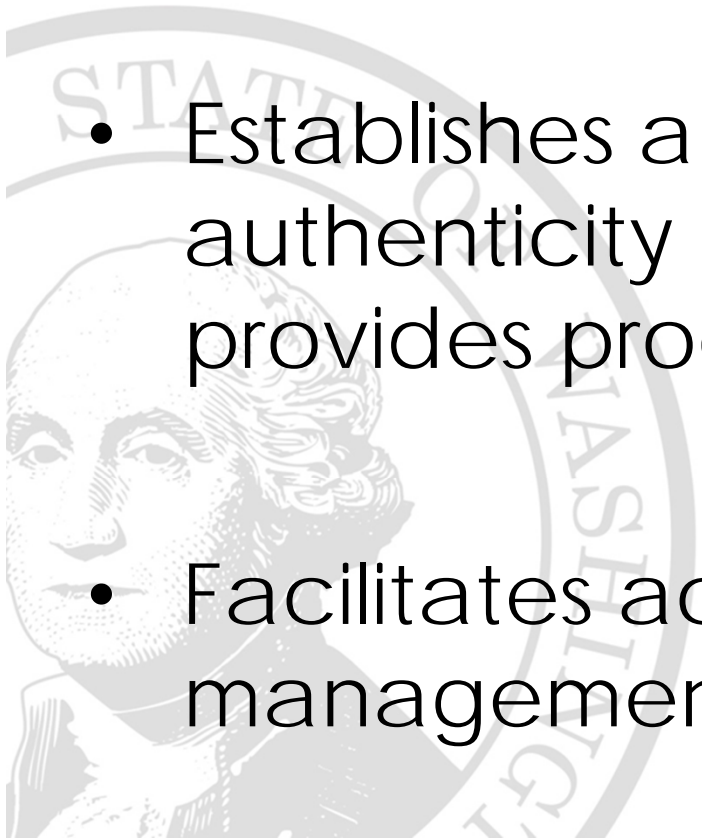
- Records that have a designation of Essential in records retention schedules



Much ado about metadata

Commonly described as
“data about the data”

- Establishes and preserves the authenticity of an electronic record – provides proof and integrity
- Facilitates access, retrieval and management of resulting images



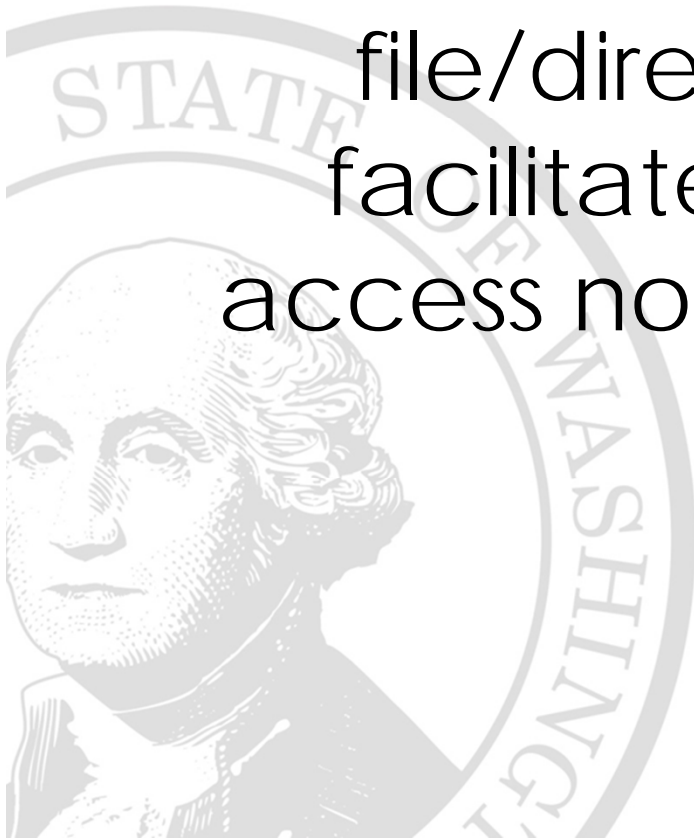
Metadata and indexing

Imaging requires consistent indexing and metadata for identification, access and retrieval of public records



More planning for the future

Analyze your business process and establish conventions and file/directory structures to facilitate organization and access now and into the future



Access and Retrieval

Develop appropriate business and recordkeeping metadata in order to identify, access and manage in the future – recommend 5 – 7 fields (humans all think differently!)

Date (when)

- Agency/Entity (who it is)
- Document type (what it is)
- Other identifiers so that you can locate it again (and again, and again!)

Unique Reference Identifier	Image File Name	Agency	Board/Commission/Div/Dept/Program	Doc Date	Doc Type
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An ounce of prevention

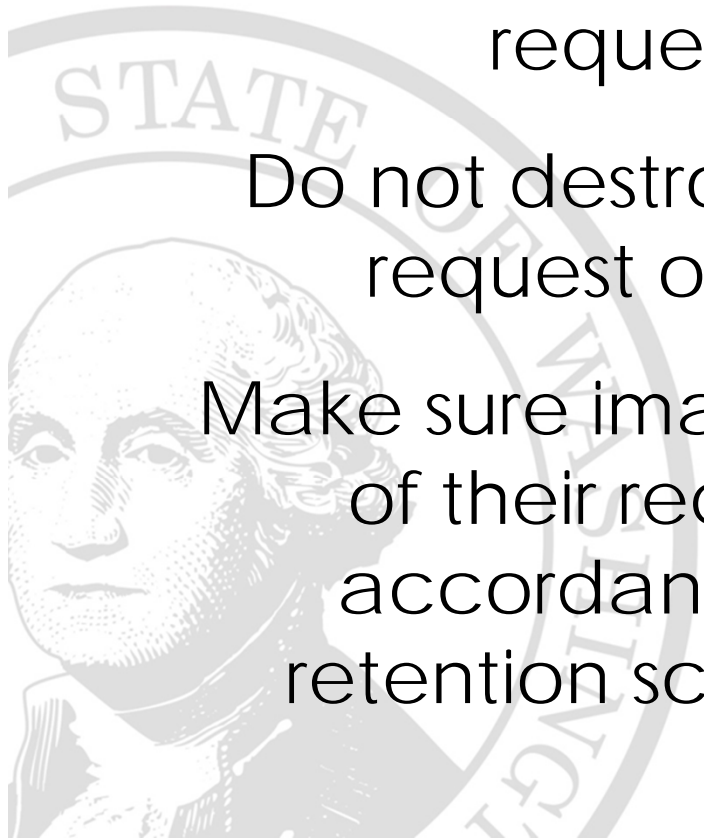
- Establish security protocols
- Designate approved users
- Do regular system checks
- Perform check sums and error-checking
- Develop disaster plans
- Generate regular backups which are securely stored at least 50 miles away offsite to enable access to and recovery of the images in the event of a disaster

Disposition and Destruction

Images are subject to the same rules for records management, public records requests and litigation holds

Do not destroy images if an open records request or litigation hold is in place

Make sure images are destroyed at the end of their required retention periods in accordance with approved records retention schedules (WAC 434-663-615)



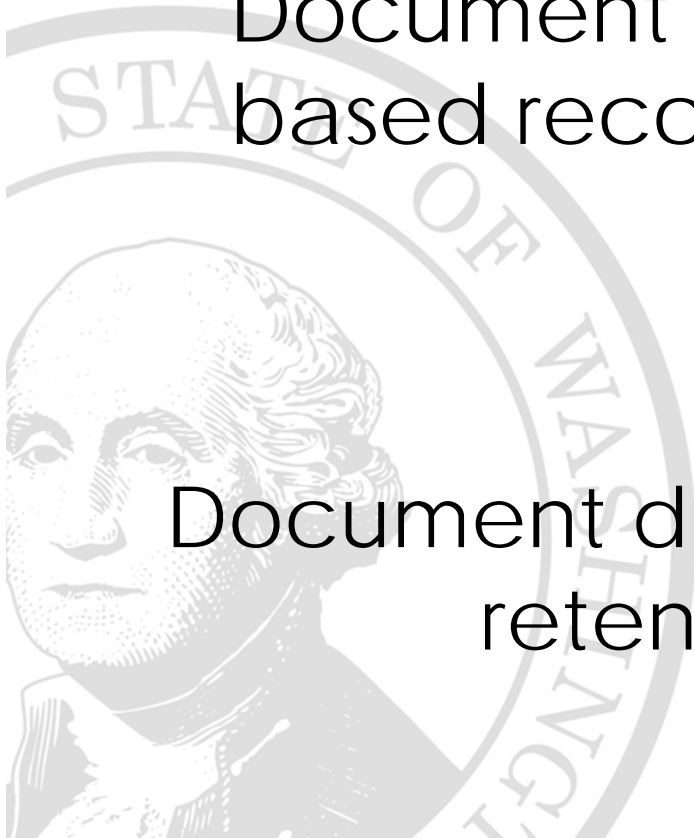
Disposition is a verb
Be proactive

Practice defensible disposition!

Document destruction of the paper based records after verifying image capture

AND

Document destruction of images once retention has been met



Available online

Requirements for the Destruction of Non-Archival Paper Records After Imaging

Washington State Archives
Office of the Secretary of State

Requirements for the Destruction of Non-Archival Paper Records After Imaging
Version 1.1 (May 15, 2012)

Requirements for the Destruction of Non-Archival Paper Records after Imaging "Scanning and Tossing"

Purpose

This document outlines the minimum requirements that state and local government agencies in Washington State must meet in order to lawfully destroy paper-based source records after they have been converted to a digital format by imaging (scanning).

The requirements and guidelines in this document are drawn from state and national records-imaging standards to provide additional guidance on scanning procedures, design and maintenance for scanning systems, and quality control measures to ensure complete and accurate copies of paper-based source documents.

These requirements and guidelines promote best practices for ensuring access to, and retrieval of, digital images throughout their legally-required minimum retention period(s), and assist state and local government agencies with the implementation of:

- Washington State records retention schedules;
- Chapter 40.14 RCW Preservation and Destruction of Public Records;
- WAC Preservation of Electronic Records; and,
- Washington State Standards for Accuracy and Durability.

Washington State Standards for the Production and...

...ers relating to...

Washington State Archives

Records Management Advice
Issued: November 2013
(Originally Issued: March 2012)

Electronic Records Management: What Happened to the EIS / DAD Approval Process?

Purpose: Provide guidance to state and local government agencies on process changes when seeking approval to destroy paper records after imaging (scanning).

Process

In March 2012, state and local agencies needed to submit an application to Washington State for approval to destroy their paper records after imaging. This process was originally called "Records after Imaging Systems (EIS)" and then later, "Requests for the Early Destruction of Source Documents After Digitization (DAD)".

Steps - No Application/Form to Submit

1. Washington State Archives released the Requirements for the Destruction of Non-Archival Paper Records after Imaging which outlines the requirements that agencies must follow when destroying "Non-Archival" paper records after imaging (scanning).
2. Washington State Archives released the Requirements for the Destruction of Non-Archival Paper Records after Imaging which outlines the requirements that agencies must follow when destroying "Non-Archival" paper records after imaging (scanning).

<http://www.sos.wa.gov/archives/RecordsManagement/Destruction-of-Public-Records.aspx>

You are not alone

Questions?

recordsmanagement@sos.wa.gov

Thank you!

Washington State Archives

Partners in preservation and access

