|  |
| --- |
| Records Digitization Policy TemplateFor Use by Connecticut Public Agencies |
| A close-up of a logo  Description automatically generated with medium confidence*Office of the Public Records Administrator State Archives* |



July 2023

Version 1

**[**This policy template provides guidance for state agencies within the executive branch; certain quasi-public agencies; towns, cities, boroughs, and districts; and other political subdivisions of the state in the development of a local digitization policy as required by ***Public Records Policy 04: Electronic Records Management*[[1]](#footnote-2), *Public Records Standards 04-1: Electronic Records*[[2]](#footnote-3), and *Public Records Standards 04-2: Digital Imaging***[[3]](#footnote-4)released by the Connecticut State Library’s Office of the Public Records Administrator (OPRA) and the State Archives. For the purposes of this document, the terms “public agency/agencies,” “public records/records,” and “electronic records” are the same as in the PRP 04 and related standards.

This template pertains to digital images created from hard copies of public agencies’ records. Public agencies are not required to use the exact language within the template but must address within their policies and procedures all content areas below. **[Upon completing this policy, delete the bold and bracketed portions as these sections either contain guiding questions, optional language, or are intended for guidance purposes only.]**

The individual responsible for overseeing management of a public agency or one of its internal departments’ electronic records should confer with stakeholders to tailor the policy to the agency’s specific digitization practices wherever applicable and should provide as much detail as possible.

A public agency must submit the policy to the Office of the Public Records Administrator for review and filing to satisfy the requirements as outlined in ***Public Records Memorandum 101: Disposition of Original Paper Records after Scanning***[[4]](#footnote-5). Agencies with policies on file with the Office of the Public Records Administrator are no longer required to submit RC-108.1 or RC-075.1 forms to dispose of hard copy records after digitization. Public agencies should also develop a policy for born digital records and general records management but are not required to submit that policy to this office.

**Delete this bracketed introduction section upon completing this policy.]**

|  |  |  |  |
| --- | --- | --- | --- |
| Subject:  |  | Policy Number: |  |
| Effective date:  |  | Modified date:  |  |

|  |
| --- |
| Type of Public Agency: [ ]  Municipal\* [ ]  State Agency\*  |
| Name of Municipality/Agency: |  |
| Name of Office:  |  |
| Office Address: |  |

\*Includes quasi-public agencies and other political subdivisions of the state in the Municipal and State Records Management Programs

Table of Contents

[1. Purpose and Scope 4](#_Toc139626292)

[2. Agency Requirements: Responsible Parties 4](#_Toc139626293)

[3. Digital Imaging Documentation and Procedures 5](#_Toc139626294)

[4. Management of Digitized Records 8](#_Toc139626295)

[5. Certification Statement 11](#_Toc139626296)

# Purpose and Scope

**[Describe the purpose of this policy. To what records does it apply? When will this policy be reevaluated and updated (every [x] years, upon the adoption of or migration to new information systems, etc.)? We suggest referencing adherence to *Public Records Policy 04: Electronic Records Management*, *Public Records Standards 04-1: Electronic Records*, and *Public Records Standards 04-2: Digital Imaging.*]**

# Agency Requirements: Responsible Parties

**[Public agencies are responsible for establishing appropriate policies, procedures, business practices, and periodic reviews to ensure the authenticity, reliability, integrity, security, and usability of electronic records over time, irrespective of whether the information systems used to create, manage, and store the records are managed by the agency, central IT (where applicable), or a third party. All personnel who create, receive, access, use, or manage records must be notified of their records management responsibilities through records policies, procedures, and training. Policies and procedures should be developed with all relevant stakeholders (including Records Management Liaison Officers and/or designated records personnel) and must address records management requirements and guidance issued by the Office of the Public Records Administrator and the State Archives.**

**If a public agency contracts with a vendor for imaging services, management, or storage of its electronic records the public agency retains the responsibility to ensure that the vendor complies with all applicable sections of this policy. If a public agency uses an application such as an Electronic Records Management System (ERMS) to manage electronic records, the system must conform to standards set by the Office of the Public Records Administrator and the State Archives.]**

**[Describe the** **digitization and electronic records management responsibilities of the persons or departments responsible for adhering to this policy. These are examples of possible stakeholders – please tailor and rearrange this section to reflect the actual parties and their responsibilities within your agency.**

**Examples of what to include (this list is not exhaustive):**

* **Position(s) responsible for maintaining and evaluating this policy**
* **Position(s) responsible for training and/or communicating procedures to agency employees**
* **Position(s) responsible for digitizing records**
* **Position(s) responsible for disposing of hard copy records after digitization**
* **Position(s) responsible for contacting the State Archives prior to the disposal of hard copy permanent/life of structure/archival/may have historical value/archival review required records after digitization**
* **Position(s) responsible for maintaining information systems and system documentation**
* **Position(s) responsible for maintaining relevant vendor list(s) and the services provided]**

**The following roles and responsibilities support this digitization policy. [You do not need to include names of specific employees, but we recommend that a list of personnel who fulfill these roles at this agency is maintained by one of the stakeholders listed below.]**

###### **Agency Supervisor/Division Director**

Responsibilities include:

###### **Records Management Liaison Officers (RMLOs)[[5]](#footnote-6) (State Agency) and/or Designated Records Personnel (Municipality)**

Responsibilities include:

###### **Managerial Staff**

Responsibilities include:

###### **IT Staff**

Responsibilities include:

###### **Records Creators**

Responsibilities include:

# Digital Imaging Documentation and Procedures

**[Your agency must establish and implement written policies and procedures for digitizing public records. Describe the information system in detail (including any hardware and software components), procedures for maintaining and operating the system, how original and imaged records are managed, and requirements for destruction of original records. If you are describing multiple systems and sets of procedures, you may consider dividing this section into separate subsections for each system. This section must cover, at minimum, adherence to *PRP 04: Electronic Records Management*[[6]](#footnote-7) and *PRS 04-2: Digital Imaging Standards*[[7]](#footnote-8). The headings below are examples – you may format this section however you would like, but you must address every concept. The below questions are not exhaustive; be sure to review PRP 04 and PRS 04-1 and 04-2 for additional requirements.**

**All sections must be addressed whether digitization is completed by a contracted vendor or by in-house scanning.]**

###### **Project Plans and Workflows**

**[Guiding questions:**

* **How will your agency inventory and prepare records for the digitization process?**
* **How will your agency develop and maintain workflows for digitization of records as part of routine work?**
* **How will your agency develop and maintain a project plan for a digitization project?**
* **How will your agency maintain intellectual and physical control of source records during digitization?**
* **How will your agency ensure vendor contracts adhere to the standards of your policy and state requirements?**
* **How will your agency identify source records with personally identifiable information (PII), personal health information (PHI), criminal history information (CHI) or any other applicable statues, regulations, or policies regarding the handling of confidential information?**
* **How will the digitization process be tested/reviewed to identify and adjust issues?]**

**[We recommend maintaining organizational documentation that maps each type of hard copy document to its corresponding electronic copy, relevant retention schedule(s), etc. For example:]**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Physical Record Description | Electronic Record System/Location | Electronic Record Metadata/Indexes | Relevant Retention Schedule(s) | Digitization Policy Reference Code/ID |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

###### **System and Procedural Documentation**

**[Guiding questions:**

* **What are the information systems used to produce and manage the agency’s digitized records?**
* **What are the hardware and software systems the agency uses to digitize? Specify document/image scanner manufacturer and model number, driver software for scanner, and imaging software if applicable. If your agency contracts with a vendor, the service level agreement must describe the operating environment and equipment.**
* **Which position(s) at your agency will maintain system and procedural documentation (manuals, workflows, etc.)?**
* **How often will the agency review system and procedural documentation?**
* **What are your agency’s scanning specifications? See PRS 04-2, Sections VI-IX[[8]](#footnote-9) for minimum specification requirements. Specify the following, at minimum:**
	+ **Resolution of scanned images, as well as any compression standard used**
	+ **File formats of scanned images**
	+ **File naming conventions used for scanned images**
	+ **Whether batch conversion or batch file renaming will be necessary, and what tool is used for such conversions**
	+ **Whether any image enhancement techniques should be conducted after imaging]**

###### **Quality Control, Auditing, and Audit Trails**

**[Guiding Questions:**

* **Document any visual and/or automated quality control inspection actions planned during the digitization project to ensure the resulting digital record is complete and meets minimum standards for that digital record.**
* **How will your agency ensure that the following features of imaged records are legible:**
	+ **Individual letters, numbers, and symbols**
	+ **Combinations of letters, numbers, and symbols forming words or sentences**
	+ **Graphics such as signatures, logos, and pictures**
	+ **Other features of records such as color, shape, texture, etc., that relate to the content of the information**
* **How often will agency employees audit imaged records for accuracy, readability, and reproduction capabilities?**
* **What are your agency’s remedial procedures if the expected level of accuracy is not achieved?]**

###### **Training**

**[Guiding questions:**

* **For agencies that scan in-house – how will your agency train employees to digitize records?]**

###### **File Formats, Structures, and Naming Standards**

**[Guiding Questions:**

* **What are your agency’s file naming standards. What abbreviations are used? See PRS 04-1, Section XI[[9]](#footnote-10) and PRS 04-2, Section XI[[10]](#footnote-11) for additional guidance.**
* **What kind of file structure is used?**
* **Electronic files must be saved in formats that comply with PRS 04-1, Section X[[11]](#footnote-12). What file formats are currently used by your agency?]**

###### **Indexing and Metadata**

**[Guiding Questions:**

* **How will your agency index imaged records in order to facilitate efficient retrieval, ease of use, and up-to-date information about the images stored?**
* **How will your agency capture the content, structure, and context of imaged records?**
* **What are the minimum metadata requirements and how will metadata be maintained alongside the records?[[12]](#footnote-13)]**

###### **Retention of Original and Duplicate Records**

**[If you designate digital images as the official record copy, these scanned records must be maintained for the specified retention period defined in the appropriate records retention and disposition schedule.[[13]](#footnote-14) The retention period is considered to have begun when the original document was created, not when the electronic version was produced. Any hard copy generated from the imaged records will be considered the agency’s duplicate “working” record or reference copy.**

**Guiding Questions:**

* **Will all digitized records be considered the record copy, or only certain types of records? If choosing to dispose of hard copy after digitization, this must be consistent across record series, i.e., cannot digitize only some files from a record series but not others (must be consistent part of workflow). If you are only digitizing select files/sampling of records, you must retain the paper.**
* **Include a statement designating the digital image as the official record copy if the images replace the original records.**
* **Describe the process for disposal of hard copy records after digitizing.]**

###### **Disposition of Permanent Paper Records after Digitization**

**[Guiding Questions:**

* **List the record series of any (1) permanent, (2) archival, (3) archival review required, (4) may have historical value, or (5) life of structure records that your agency intends to digitize and dispose of the paper.**
* **Prior to disposal of paper records designated on a records retention schedules as (1) permanent, (2) archival, (3) archival review required, (4) may have historical value, or (5) life of structure your agency must contact the State Archives. The State Archivist may request transfer of paper records to the State Archives or a scheduled transfer of the digitized records.**
* **Describe the process for disposal of permanent paper records after digitizing (i.e., Position(s) to contact in your agency; position(s) that contacts the State Archives? Do you dispose of the paper in-house or use a vendor? How long after digitizing will the paper records be kept until destroyed?]**

# Management of Digitized Records

**[Describe the processes through which digitized records are managed, including how a record is accessed, stored, protected, audited, or locked to prevent changes, and transferred from one storage medium to another.[[14]](#footnote-15) Please inventory where records are stored and what types of records are stored within the system. If you are describing multiple systems and sets of procedures, you may consider dividing this section into separate subsections for each system.]**

###### **Information Systems**

**[Guiding Questions:**

* **Describe any available training for system use and electronic records management.**
* **What auditing procedures does your agency have in place – is there documentation on which position(s) have permission to access and modify files maintained by the agency or a log of activities on the system which shows which individual(s) accessed the system, how and by whom records were created and modified, and whether standard procedures were followed, etc.?**
* **How and when will you audit your agency’s information system for accuracy, adequacy, timeliness, training, and audit trails?**
* **What is contained within your agency’s system documentation, procedural manuals, security backup and disaster recovery procedures, and service level agreements for contracted records and information management services (records management systems, digital preservation systems, etc.)?**
* **What position(s) maintains the documentation, how often is it reviewed and updated, and what is its retention period?**
* **What system hardware and software are used to create and store your agency’s electronic records?]**

###### **Security and Disaster Backup and Restoration**

**[Guiding Questions:**

* **How does your agency maintain security of its information systems and the records it holds?**
* **How are access rights managed to prevent unauthorized viewing of documents?[[15]](#footnote-16)**
* **How is confidential information separated from non-confidential information?**
* **How is physical access to computers, disks, and external hard drives monitored?**
* **How are system password and operating procedure manuals kept secure?**
* **How often are routine backups conducted? Where are backups stored? Are any backups geographically remote?**
* **If using local storage media, what kind? Note: individual user storage accounts, CDs, flash drives, and external hard drives are not sufficient for long-term storage.]**

###### **Metadata**

**[Cross-reference “Indexing and Metadata” in Section 3. For minimum metadata required, refer to PRS 04-2, Section XII.[[16]](#footnote-17)**

**Guiding Questions:**

* **How is metadata maintained?**
* **List any additional minimum metadata required to locate and maintain your agency’s records? Be specific to the needs of your agency, taking into consideration different record types.]**

###### **Retention and Disposition of Digitized Records**

**[Digitized records that are designated the official record copy must be retained for the full retention period for the record as listed on OPRA records retention and disposition schedules.**

**Guiding Questions:**

* **Describe disposition procedures for digitized records. Please note, form RC-108 (state) and form RC-075 (municipal) are required for final disposition of digitized records.]**

###### **Digitized Records Storage**

**[Guiding Questions:**

* **How will your agency ensure the continued accessibility of digitized records?**
* **How often will your agency audit and assess digitized record data?**
* **What will your agency do if you find evidence of file corruption?**
* **How will you ensure records are migrated to new file types when new information systems require them to be updated to render properly?**
* **How will your agency maintain local storage media? Note: individual user storage accounts, CDs, flash drives, and external hard drives are not sufficient for long-term storage.**
* **How will your agency label or index media used to store data?**
* **Does your agency maintain geographically remote storage?]**

###### **Cloud Computing**

**[Guiding Questions:**

* **For agencies that store electronic records using cloud-based technology: describe your agency’s cloud-based practices.**
* **How is the technology used: as a storage site that mirrors locally hosted data, as the sole storage entity for data, or as a collaboration tool used during the drafting process?**
* **What backup measures are in place?**
* **Should the vendor fail or should the agency otherwise discontinue service with the vendor, is the agency able to recover its electronic records, and in what form is that data available?]**

###### **System and File Format Migration**

**[Guiding Questions:**

* **Describe your agency’s plans to migrate records, associated indexes, and metadata to a new media platform and/or file format as needed to ensure content remains accessible.****]**

###### **Vendor-Provided Services/Hosted Solutions**

###### **[State agencies that contract out electronic records management services, including digital imaging, should follow the State of Connecticut Office of Policy and Management (OPM) and Department of Administrative Services (DAS) procurement policy and contracts. Municipal agencies that contract out electronic records management services, including digital imaging, should emulate existing state contracts and/or otherwise ensure that vendor contracts adhere to requirements set in PRP 04 and PRS 04-1 and 04-2. Vendor contracts must adhere to requirements set by the agency (metadata, security, etc.). Maintain a list of any contracted vendors used by the agency and the services they are providing.]**

# Certification Statement

The undersigned parties certify that this policy is being maintained and reviewed in compliance with ***Public Records Memorandum 101: Disposition of Original Paper Records after Scanning***[[17]](#footnote-18)***, Public Records Policy 04: Electronic Records Management*[[18]](#footnote-19), *Public Records Standards 04-1: Electronic Records*[[19]](#footnote-20), and *Public Records Standards 04-2: Digital Imaging***[[20]](#footnote-21) and that all digitized images will be properly maintained and will remain accessible for their full retention period. **[Remove unneeded sections below.]**

**[If State Agency]**

**Agency Head**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**Division Head [if policy is division-specific]**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**Records Management Liaison Officer(s) (RMLOs)**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**[If Municipality]**

**Head of Municipality**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**Town Clerk [if policy is town-wide]**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**Department Head [if policy is departmental]**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

**Superintendent of Schools [if policy applies to education records]**

|  |  |
| --- | --- |
| Approved by: |  |
| Title: |  |
| Signature: |  | Date: |  |

1. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRP04ElectronicRecordsManagement2022.pdf> [↑](#footnote-ref-2)
2. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-1ElectronicRecordsStandards2022.pdf> [↑](#footnote-ref-3)
3. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-4)
4. <https://ctstatelibrary.org/wp-content/uploads/2023/04/PRM101PaperCopyDisposition2023.pdf> [↑](#footnote-ref-5)
5. For general information about the RMLO role, see Public Records Policy 7: Records Management Liaison Officer (RMLO) and Assistant RMLO ‐ Appointment and Duties (<https://ctstatelibrary.org/wp-content/uploads/2015/05/PRP07-RMLO.pdf>) [↑](#footnote-ref-6)
6. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRP04ElectronicRecordsManagement2022.pdf> [↑](#footnote-ref-7)
7. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-8)
8. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-9)
9. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-1ElectronicRecordsStandards2022.pdf> [↑](#footnote-ref-10)
10. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-11)
11. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-1ElectronicRecordsStandards2022.pdf> [↑](#footnote-ref-12)
12. For more information, see [PRS 04-2, Section XII. Metadata Requirements](https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf) [↑](#footnote-ref-13)
13. The Society of American Archivists *Glossary of Archival and Records Terminology* defines record copy as “the single copy of a document, often the original, that is designated as the official copy for reference and preservation.” Available at <http://www2.archivists.org/glossary/terms/r/record-copy>. [↑](#footnote-ref-14)
14. State agencies are encouraged to consult [statewide technology policies](https://portal.ct.gov/OPM/Fin-General/Policies/PoliciesGuidelines-and-Labor-Contracts#Technology) for relevant sections. [↑](#footnote-ref-15)
15. See [PRS 04-1, Section III, E. and PRS 04-1, Section IV](https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-1ElectronicRecordsStandards2022.pdf). [↑](#footnote-ref-16)
16. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-17)
17. <https://ctstatelibrary.org/wp-content/uploads/2023/04/PRM101PaperCopyDisposition2023.pdf> [↑](#footnote-ref-18)
18. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRP04ElectronicRecordsManagement2022.pdf> [↑](#footnote-ref-19)
19. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-1ElectronicRecordsStandards2022.pdf> [↑](#footnote-ref-20)
20. <https://ctstatelibrary.org/wp-content/uploads/2022/12/PRS04-2DigitalImagingStandards2022.pdf> [↑](#footnote-ref-21)