

## Sample Plan for Managing Electronic Information/Records

### Introduction:

The information/records created and maintained in electronic format are vitally important to the operation of any organization; they serve as the organization's memory and are evidence of past events and the basis for future actions. When created, maintained and disposed in an orderly and systematic manner, information can be a tremendous asset; when treated in a haphazard and disorderly manner, they can reduce the effectiveness of an organization and increase its costs substantially.

One of the most commonly asked questions is "Are we a government entity?" In general terms, if you are a state agency, city, county, township, school district, a subdivision of any state agency, city, county, township, school district, or other political subdivision or statewide system, you are a government entity and therefore, subject to The Wyoming Public Records Act – WPRA (Wyoming Statutes 16-4-201 through 16-4-205) (available at: <http://legisweb.state.wy.us/statutes/titles/title16/c04a02.htm>), which requires government agencies keep records to fulfill the obligations of accountability and which mandates that your records be accessible to the public, unless categorized as restricted by the state legislature or by federal mandate. It further stipulates that records which are created electronically will be available to the public in the same way other state records are and will be legally admissible in court.

By law, the chief administrative officer of the government entity has the responsibility to protect records and deliver them to a successor to assure smooth transition and continuity. Although entities must keep records, this does not mean all records must be retained permanently. In fact, the WPRA and accompanying rules state that as a government employee, you have a responsibility to dispose of data when it is determined to have completed the records life cycle.

The purpose of this guide is to help Wyoming state and local government entities identify electronic records, assess their value, and determine how long and where to keep them. It provides a general overview of state and local government entities' records management responsibilities and the steps in establishing an electronic record program.

### What is a record?

The definition of a government record is found in the WPRA referenced above.

Government records are...

- cards
- correspondence
- disks, tapes
- maps
- memoranda
- electronic mail
- papers
- photographs
- recordings
- reports
- microfilm
- optical disks

- writing and other data, information or documentary material, regardless of physical form or characteristics, storage media or conditions of use made or received pursuant to state law or in connection with the transaction of public business by an officer or agency.

In other words, information which you create or receive in fulfillment of your government work is considered a record, and is subject to the records management statutes. Over the past few years, questions have been raised about the difference between paper versus electronic records. As an example: How long do we have to keep correspondence we've received in the mail versus how long do we have to keep our electronic mail? The answer is, there is no difference. It does not matter in which form the correspondence was received, paper via U.S. Postal Service or electronically using the Internet. The record is still "correspondence" and the retention period is the same. To assist state agencies in understanding electronic mail and other technology-based tools, the Wyoming State Archives have a number of guidelines available to assist in identifying and managing electronic records.

Government records are not...

- data and information that does not become part of an official agency business;
- library and museum material made or acquired and kept solely for reference or exhibit purposes;
- extra copies of documents kept only for convenience or reference;
- stock of publications and blank forms.

If you need help determining whether or not something is a record, please contact the Wyoming State Archives (WSA) at 777-7826 or [wyarchive@state.wy.us](mailto:wyarchive@state.wy.us).

## **Getting Started**

The first step in implementing an effective electronic records management program is to identify all record and non-record materials stored on your office servers, desktop computers, and other storage devices and media. Electronic records include such information as e-mail, correspondence, memoranda, GIS applications, graphics, digital images, databases, and any other information needed to conduct your agency's business. A records inventory identifies what records you have, where they are stored, and in what quantity. This process not only will provide information on the volume of records stored, but also will help identify records that are no longer being created, and those that should be revised, automated or eliminated. When taking your inventory, do not overlook hard drives on employees' desks, floppy disks, and CDs.

Taking an inventory will involve identifying records series in your office (a records series is a group of records filed together because they all relate to a particular subject), evaluating the administrative, legal, fiscal and historical value of those records, defining data practices implications, and identifying vital records.

Much of this evaluation process has been accomplished for you in earlier inventories and published in agency retention listings. There are also General Records Retention Schedules, which lists records series common to most entities and indicates how long to keep them. Retention schedules have been developed by the WSA and approved by the State Records Committee for Wyoming counties, cities, school districts, townships and state agencies, and are available on line at <http://wyoarchives.state.wy.us> or from the WSA.

Obtaining a copy of your agency's retention schedules and the appropriate General Schedules and comparing them to the records in your office will give you a good start on your records inventory.

When you identify records in your office not listed in your schedules or the General Schedule, contact the WSA. We will provide you with inventory worksheets for you to complete and return, or we will come to your agency and assist you in revising existing retention schedules or creating new schedules as needed

If you request our assistance, we will guide you through the process of assessing the value of your records. This includes evaluating, classifying data for purposes of the WPRO, identifying vital records, and determining retention periods for your records.

Once your electronic records have been inventoried and recommended retention schedules have been developed, the WSA will present the new and revised schedules to the State Records Committee (SRC). The SRC will review all requests for new and revised retention schedules.

After the SRC's review and approval, the WSA will publish a new listing of your agency's retention schedules. These schedules are your legal authority to be followed in managing your electronic records.

## **Storage**

Upon approval of your retention schedules, you will need to determine how best to manage your records. Digitally born records will have to be stored in a manner which will allow them to be accessed by those authorized for the entire life cycle of the record series. For a fuller explanation of managing your electronic records please refer to the WSA's Electronic Records Management Guidelines, Electronic Records Management Strategy available on our website.

Storage needs to be in a logical manner that will allow for easy access and identification of records which have completed their legally defined life cycle and are eligible for disposal/deletion. There are a number of Electronic Records Management (ERM) programs available to help an agency manage their electronic records. The WSA recommends that if an agency is considering the purchase of an ERM, it is best to review programs which meet DOD 5015.2 standards.

Should your agency determine that an ERM is not a viable option; an Electronic Records Repository (Repository) may be your choice. The Repository is a series of directories and subdirectories identified as the common storage area on an agency server. The directories are shared by all agency personnel with a need to have access to the stored information. Depending on the size of your agency you may choose to create directories for the entire agency, program areas, or work units.

The principle behind the Repository is to allow individuals with a need to access agency documents to access those documents and at the same time to protect the documents from unauthorized alteration or deletion. The Repository does this by the use of user or group rights which are defined in the system.

For the Repository to be successfully implemented, an agency will need to create a series of folders and subfolders on a server. These folders should reflect the agency's legally approved Records Retention Schedules or file plan. The folders should look like those discussed below. Rights to access the Repository folders should be given only to authorized staff.

The entire directory should be given "read" rights. Since most users will have "read only" rights, only information which has been finalized should be placed in the Repository. "Administrative rights" should only be given to the Information Technology section and the Records Officer or their designated representative(s).

The folders and subfolders placed in the Repository should be named in such a manner that record creators will easily identify the correct folder to place the finalized record. Use of the titles of your records series for naming of the folders in the Repository is recommended. Below is an example of how folders within the Repository could look:

Folder: Federal Programs and Grants – 4 years  
Sub-folder: 2003  
Sub-folder: File Folder Structure Project  
Sub-folder: Space to Move and Store Information

Using the above folder structure, a person working with a federal grant on the *File Folder Structure Project* in 2003 would know that all finalized information pertaining to that grant should be saved and maintained in that sub-folder. A person looking at the folders could also tell that the retention for these records is four years. The number and types of sub-folders will be dictated by the amount and variety of information pertaining to a particular record series.

If your agency had only one federal program or grant that information could easily be managed in a single sub-folder, your folder system for that record series might look like the example below:

Folder: Federal Programs and Grants – 4 years  
Sub-folder: 2003

Since you only have one grant, you would only need to identify the year of the grant. You could delete the folder and information contained in the folder at the end of the four year retention period.

To help agency staff in determining what is in a particular set of folders and sub-folders, the use of a “readme” file is highly recommended for all record series folders. “Readme” files are small text files which explain in summary form the contents of the folder. This file is usually created in a word processing program and saved as a non-proprietary text file. “Readme” files are extremely important in providing documentation of records maintained on the server. An example of a “readme” file for a folder is as follows:

Folder: Federal Programs and Grants – 4 years

File Name: readme.txt

Content of readme.txt: This folder contains records pertaining to programs and grants which are federally funded. The folders are organized by year.

Sub-folder: 2002

Sub-folder: File Folder Structure Project

Sub-folder: Space to Move and Store Information

Another text file recommended for use in your Repository is the “pointer” file. “Pointer” files are small text files which explain the location of paper records pertaining to those electronic records maintained in the folder. This file is usually created in a word processing program and saved as a non-proprietary text file. “Pointer” files are extremely important in integrating paper and electronic record-keeping systems. An example of a “pointer” file for a folder is as follows:

Folder: Federal Programs and Grants – 4 years

Sub-folder: 2002

Sub-folder: File Folder Structure Project

Sub-folder: Space to Move and Store Information

Filename: pointer.txt

Content of pointer.txt: Paper records pertaining to this folder are located in the Director’s office in a black three-ring binder labeled “Space to Move and Store Information.”

### *Who will be granted access to the Repository?*

Your most basic decision about the Repository is who will have access. Access should be granted on a need basis. Very few of your agency’s staff will need access to the entire Repository. Most employees only need access to the records for their work section or unit. Program Managers may need access to the records in their program. The Agency directory may need access to all areas within the Agency. If your system is designed for

group rights administration, it is recommended that that access to the Repository be granted to groups rather than on an individual basis.

### *User Rights*

User right will control access and protect your agencies records to ensure they are trustworthy, complete, accessible, legally admissible in court, and durable for as long as your legally approved records retention schedules require. Users should be given the least user rights necessary to do their job. By limiting user rights, the Repository will continue to be trustworthy and accessible. Only the Information Technology unit and Records Officer or designee(s) should have full rights. All other users should be given rights to see, read, and copy information into the Repository. They should not be given rights which would allow them to change or move a record maintained in the Repository. At the end of this guideline is a listing of recommended responsibilities for the different agency personnel.

To help you understand the various user rights which may be granted, below is a listing of the rights which may be granted on a Novell server:

- **(R)ead** - Allows users to open/view or copy files in a directory, or run a program from a directory.
- **(F)ilescan** - Allows users to see the contents of a folder, or to see that a file exists, but not do anything with it
- **(W)rite** - Allows users to open and change the contents of files.
- **(C)reate** - Allows users to create new files and subdirectories.
- **(M)odify** - Allows users change attributes or name of files and directories
- **(E)rase** - Allows users to delete the directory, it's files and subdirectories.
- **(S)upervisor** - Allows users access to do everything in the directory, and grant access to other users. (cannot be blocked in subdirectories)
- **(A)ccess Control** - Allows users to give all rights to the directory its files and subdirectory (except Supervisor) to other users

Microsoft servers use somewhat different terminology, but function in a similar way. The important thing to remember is; the more rights granted to a user the greater chance for errors appearing in the Repository. Remember, the goal of managing your electronic records is to insure that your records are trustworthy, complete, accessible, legally admissible in court, and durable for as long as your legally approved records retention schedules require.

### *User Buy-in*

User buy-in is critical to the success of your electronic record management project. In some agencies users may think of the records they created as theirs. They created the records, and they don't want anyone "messing" with them. This attitude is fostered by allowing individual employees the opportunity to maintain the records they created in a

personal directory and never providing for the movement of the records to a common directory designed for records capture and management.

To facilitate the needed change, support from the agency director to the program managers to the supervisors and then to the individual employee is important. The agency director will need to communicate to the program administrators that the director fully supports the new way of doing business. Program administrators will have to communicate this same level of support to their staff.

Training is a key component to the buy-in process. It is recommended that one program area at a time be brought on-line. If the program areas are too large, it would be advisable to breakdown the program area into logical components for training. Training should be conducted just as you are ready for roll-out. Training should include an introduction by the program manager, an explanation of the new procedures, handouts showing how the new procedures will work, and a question and answer time. After the initial training, training at the desktop with each user will be needed to insure their understanding. The initial training should last no more than two hours, and the desktop training should last from ten to twenty minutes depending on user needs. The amount and types of training conducted by an agency should be determined by the agency's needs.

Follow-on evaluation of the training should be conducted by the Information Technology (IT) section and the Records Officer or designee. The evaluation can be conducted by reviewing use of the Repository by the newly trained users.

An agency should also consider the appointment of an Electronic Records Coordinator within a work unit or at the program area level. The Electronic Records Coordinator would be responsible for assisting with any day to day issues which might arise and to identify any record series which were not identified in the retention schedules. The coordinator would be the contact point between the user and the Records Officer and IT. At the beginning, the coordinator may have to spend some time working with staff. Less time should be required as staff becomes familiar with the Repository.

### *Importance of Planning*

The challenges of preservation and management of your electronic records can be overcome with good planning. Use the resources in the Annotated List of Resources, and thoroughly discussing the issues raised in the Discussion Questions section, to weigh the specific pros and cons of each option for your agency. Review the workbook in *Risk Management of Digital Information: A File Format Investigation* to assess your unique situation and risk. The better your agency plans the implementation of the Repository, the easier the transition will be.

## **Records Disposal**

A legally approved General Schedule or retention schedule is your authority to dispose of your electronic records. You may destroy non-archival records that have reached the end of their retention period. It is strongly recommended that you document the records you have destroyed using the Certificate of Records Destruction Form (AR6). This form is used to report all records destroyed that are on the General Schedules or entity retention schedules. This form documents that you have in fact destroyed your electronic records as part of your normal business practice. The WSA has provided an electronic copy of the AR6 on line at <http://wyoarchives.state.wy.us/SOS/AR-6.pdf>,

The final disposition of electronic records is a vital part of your information management. Keeping information longer than necessary causes your agency's servers to become overloaded with information that has met its lifecycle and is no longer needed by your agency. The information which has met its life cycle and has not been disposed of waste valuable system resources, makes it difficult to locate needed information, and may prove an unneeded liability to your agency.

To dispose of electronic records requires the information be removed from the media which stores it. Should you have the records on a hard drive, the information will need to be deleted in such a manner as to ensure the records can not be undeleted. The WSA recommends using a commercial program which randomly overwrites the deleted information at least eight times. If your records are stored on removable storage such as CD-Rs or magnetic tape, we recommend physical destruction of the media. Information which is stored on removable media should be segregated by record series and year. It is best not to store more than one year's records on the media. To store more than one year's information on the same removable media will require you to retain information beyond its life cycle or move the information which is still needed to new media prior to destruction of the old media.

### **When is the best time to start?**

There is no time like the present to get started. As mentioned above, it is important to plan how you will implement your electronic records management program. Be sure you include all of the key people who will be involved: Information Technology, legal, records manager, and end user representatives.

If you are considering new system software, make sure your new applications have the capability to meet your information life cycle requirements. Do not rush into a project without carefully looking at your business process and how your electronic records support this process. Remember not to rush the implementation. Your users will have to get used to a new way of doing things. Below are some questions to help you get started.

## Discussion Questions

- What are our goals for electronic records management?
- How is our agency affected by legal requirements?
- What directories will we need, and how will we divide them?
- Will we need to establish any new retention schedules or change those already in place?
- Are we planning on converting and/or migrating our records in the near future?
- Do we have an agency migration path for our information?
- Who will we grant access to and to what level?
- What resources do we have for processing and maintaining records?
- How will our decisions affect other groups that may need current and future access to our records (e.g., other government agencies, the public)?
- Would printing the records of long-term value be a viable option (how often will these records be accessed)?
- Are any of our records permanent as identified in our retention schedules?
- Do we plan to move to an Electronic Document Management System in the near future.

Our staff is available to work with you as you start your project. Please feel free to contact us at 307-777-7826 or [wyarchives@state.wy.us](mailto:warchives@state.wy.us).

## ***Staff Responsibilities***

### **DOCUMENT CREATOR:**

- Create document and save to 'Personal Folder' or 'Workgroup/Unit Folder' following the *File Naming Guidelines*
- Copy and paste the finalized document into the ERR
- Delete finalized and filed document from 'Personal Folder' or 'Workgroup/Unit Folder'
- Identify files in the ERR which need to be edited, moved, created, deleted, or restored
- Locate and retrieve documents from the ERR as required

### **ELECTRONIC RECORDS COORDINATOR:**

- Send requests to Records Officer (RO) if any files in the ERR need to be edited, moved, created, deleted, or restored
- Identify possible changes to Records Retention Schedules
- Assist records creators with concerns
- Review assigned portion of the ERR to determine user training needs
- Modify document placements and document names in the ERR (*following review by RO*)
- Delete misfiled documents in the ERR (*following review by RO*)

### **INFORMATION SERVICES:**

- Maintain User Access permissions (*following review by RO*)
- Restore lost documents to the ERR (*following review by RO*)
- Maintain and test Backup System
- Establish Special Need permissions (*following review by RO*)

### **RECORDS OFFICER (RO):**

- Review requests from Electronic Records Coordinators for file edits, moves, creations, and deletions on a weekly basis
- Assist with classifying and coding issues for both document placement and retrieval
- Monitor proper placement of documents in the ERR (including coding, naming, and timeliness)
- Apply the Retention Schedule to the ERR
- Contact the Wyoming State Archives Records Management Section to request changes to the agency's Record Retention Schedules.

## **Annotated List of Resources**

### **Primary Resources**

Dollar, C. M. *Authentic Electronic Records: Strategies for Long-Term Access*. Chicago: Cohasset Associates, Inc., 2000.

*This book provides a comprehensive overview of electronic records management, with chapters on key concepts, long-term access, best practices, and developing an action plan. The book also includes a comprehensive bibliography, as well as useful appendixes covering such topics as technology for records management, electronic records preservation costs, conversion standards, media life expectancies, and a preservation metadata model.*

Hunter, G. S. "Storage, Handling, and Preservation Best Practices." In *Preserving Digital Information, A How-To-Do-It Manual*. New York: Neal-Schuman Publishers, Inc., 2000: 53–93.

*These hands-on recommendations provide practical information for electronic records storage, handling, and preservation. Topics covered include useful information on the deterioration of magnetic media, recommended storage conditions, proper care and handling, file formats (including advantages and disadvantages of different formats), and other best practices.*

Minnesota Historical Society, State Archives Department. *Trustworthy Information Systems Handbook*. Version 2, August 2000. < <http://www.mnhs.org/preserve/records/tis/tis.html> >

*This handbook provides an overview for all stakeholders involved in government electronic records management on how to ensure that their information systems are accountable to elected officials and citizens through the creation of reliable and authentic information and records. The handbook discusses the characteristics that define trustworthy information. A series of worksheets in the handbook helps you evaluate and refine a system to ensure trustworthy information.*

Saffady, W. *Managing Electronic Records*. 2nd ed. Prairie Village, Kan.: ARMA International, 1998.

*This book provides a thorough discussion of the basic principles of electronic records management. Chapters include concepts and issues, electronic storage media and formats, file formats, the inventory of electronic records, retention schedules, managing vital electronic records, and managing files and media. It also includes a comprehensive glossary and bibliography.*

Stephens, D. O. and R. C. Wallace. "Electronic Records Retention: Fourteen Basic Principles." *The Information Management Journal* 34 (October 2000): 38–52.

*Providing a brief, but complete, overview of the basic principles of electronic records management, this article also contains practical guidelines for developing an electronic records management strategy.*

### **Additional Resources**

Barata K., P. Cain, R. Routledge. *Principles and Practices in Managing Financial Records: A Reference Model and Assessment Tool*. London: International Records Management Trust, Rights and Records Institute, 2001.

<<http://www.irmt.org/index2.html>>

*Of particular interest to the public sector, this handbook provides an overview of international best practices in the management of electronic financial records.*

Bill Number S-761. Washington, D.C.: Library of Congress, 2001.

<<http://thomas.loc.gov/cgi-bin/query/z?c106:S.761>>

*This site provides the results of a search for E-Sign legislation in the Thomas database of legislative information on the Internet. The site lists five versions of the bill (including the final enrolled bill) for the 106<sup>th</sup> congress (1999–2000). The site provides a downloadable file of the bill, plus links to other information about the bill in the Congressional Record and committee reports.*

COOL, *Conservation OnLine*. Stanford: Stanford University Libraries, 1994.

<<http://palimpsest.stanford.edu>>

*A compilation of materials from other sources about electronic conservation, this web site includes links to resources on disaster recovery, electronic media, electronic formats, and storage environments.*

International Council on Archives, Committee on Electronic Records. *Guide for Managing Electronic Records from an Archival Perspective*. Paris: International Council on Archives, 1997.

*This handbook provides a comprehensive overview of electronic records management from an archival perspective. It provides useful information on key concepts, such as life-cycle management, legal issues, technological issues, and implementation tactics, for all readers.*

InterPARES Project. Vancouver: School of Library, Archival and Information Studies, University of British Columbia, 2001.

<<http://interpares.org>>

*This web site is a comprehensive resource for information about the InterPARES Project. This project is an international research initiative to develop a theory and methods for permanent electronic records preservation. The site includes white papers, links to additional resources, presentations, and workshop listings.*

*Public Records Office, Records Management, Electronic Records. Surrey, United Kingdom: Public Records Office, National Archives, 2001.*

*<<http://www.pro.gov.uk/recordsmanagement/eros/default.htm>>*

*Published by the Public Records Office of the United Kingdom, this site provides a wide range of information, including downloadable documents on the management, appraisal, and preservation of electronic records; how to incorporate a policy on electronic records management; and toolkits for compiling an inventory of electronic records collections.*

*UETA Online. Napa, CA: Carol A. Kunze, 2000.*

*<<http://www.uetaonline.com>>*

*This web site, published by Carol Kunze, an attorney specializing in UETA-related issues, provides information and updates about UETA, and the status of UETA in the United States Congress.*