BUSINESS POLICIES AND PROCEDURES MANUAL

RECORDS
90.21.1
Revised 9-12
Information Technology Services
509-335-0414
Procedures, Records, and Forms
509-335-2005

Imaging University Records

OVERVIEW

University departments seeking to implement electronic document imaging systems are to comply with University and state requirements.

Electronic Document Imaging System Defined

An electronic document imaging system is a computer-based configuration of equipment and software that stores machine-readable document images and their associated character-coded index data for on-demand retrieval. Electronic images can be computer generated, or created through document scanning. (*WAC* 434-663-200)

REQUIREMENTS

State Archives

Departments are to ensure that imaging systems meet requirements of *WAC* 434-663. These state regulations address quality control, system requirements, and retention, disposition, and access to imaged records.

If the digital images will be the primary record copies, the imaging system must comply with "Requirements for the Destruction of Non-Archival Paper Records After Imaging" as approved by the State Archivist in accordance with *RCW* 40.14.020(6)(a):

www.sos.wa.gov/archives/RecordsManagement/How-to-Destroy-Non-Archival-Records.aspx

Select **Destroy Paper Records After Scanning**

Contact the Office of Procedures, Records, and Forms for assistance; telephone 509-335-2005. If the original source documents are retained in accordance with existing approved retention schedules as the primary record copies, compliance is not required.

FERPA and Security Standards

Departments are to ensure that systems and practices used for managing and maintaining imaging systems and data comply with applicable state and federal regulations and standards, including, but not limited to:

• Family Educational Rights and Privacy Act (FERPA) (12 U.S.C. 1232g and implementing regulations).

• Washington State Office of the Chief Information Officer (OCIO) Standard No. 141.10 "Securing Information Technology Assets:"

ofm.wa.gov/ocio/policies/documents/141.10.pdf

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UNIVERSITY STANDARDS   Records stored in imaging systems are to be managed in accordance with University policies and procedures for the use of University equipment, property, data, and records. Refer to *BPPM* Chapter 20 (Property), Chapter 90 (Records), and *EP8* (University Data Policies).

In addition to the requirements in *WAC* 434-663, University requirements for imaging systems include the following.

ITS Involvement   During the planning stage, the implementing department is to contact Information Technology Services (ITS). ITS personnel can provide guidance regarding existing imaging resources and license agreements.

System Requirements

System Architecture   The system architecture is to allow flexibility in exporting and importing data to other nonproprietary systems. Systems should consist of hardware and software that conform to nonproprietary standards and should be constructed in open system architecture.

File Formats   Electronic documents stored in an imaging system are to be in standard image file formats. TIFF (Tagged Image File Format) file format is the preferred standard for documents submitted through a scanning system. Other industry-standard file formats are acceptable, provided complete documentation is maintained.

Indexing   The indexing values used to retrieve images should be stored in an open relational database.

Header Labels   Imaging systems should use nonproprietary header labels for long-term storage of images. If a proprietary header is used, the system must provide a mechanism to produce images with nonproprietary header labels for long-term storage.

Retention, Use, Disposal   University records retention and disposal requirements apply to imaged records (*BPPM* 90.01).

Retention   Original source documents and imaged copies are subject to the approved retention policy documented on the retention schedule for the department.

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Retention (cont.)

Typically, the source document is retained until it is imaged and the electronic image is verified, indexed, and copied. Often, the imaged copy becomes the official record and the source documents are shredded or recycled. In such cases, the imaging system itself must comply with state requirements before records retention is considered. See Requirements.

To request a retention period for source and imaged documents, department records coordinators are to contact the University Records Officer in the Office of Procedures, Records, and Forms; telephone 509-335-2005. A retention schedule is established based upon information content, function, and legal requirements.

NOTE: Retention schedules are to be established and approved *in advance* of imaging system implementation.

File Maintenance

Departments must have in place procedures for maintaining and filing source and imaged documents throughout the required and approved retention period.

Back Up

Departments must have in place procedures for regularly backing up imaged documents and associated indexes. The back up copy is to be available if the record copy becomes inaccessible due to disaster, vandalism, theft, malfunction, or any other cause.

Disposal

Departments must have procedures for properly eliminating or disposing of imaged records that exceed retention periods. NOTE: Just deleting the pointer in the index is not sufficient. The actual record must be deleted from the media.

Archival Records

Departments are responsible for ensuring the safekeeping of all records, including those identified as "archival" or "potentially archival." Archival documents are retained in accordance with the applicable retention schedule and transferred to Manuscripts, Archives, and Special Collections (MASC) at the end of the retention period (see *BPPM* 90.02).