

Electronic Records Retention

October 10th, 2019

Jessica Hills

Electronic Records Analyst

South Carolina Department of Archives and History

Why?

- Why do I need to organize my electronic records?
 - It is the law
 - Section 30-4-20 defines a public record and states “includes all books, papers, maps, photographs, cards, tapes, recordings, or other documentary materials **regardless of physical form** or characteristics prepared, owned, used, in the possession of, or retained by a public body”
 - Cost and Efficiency
 - Long-term maintenance costs
 - Historical Relevance

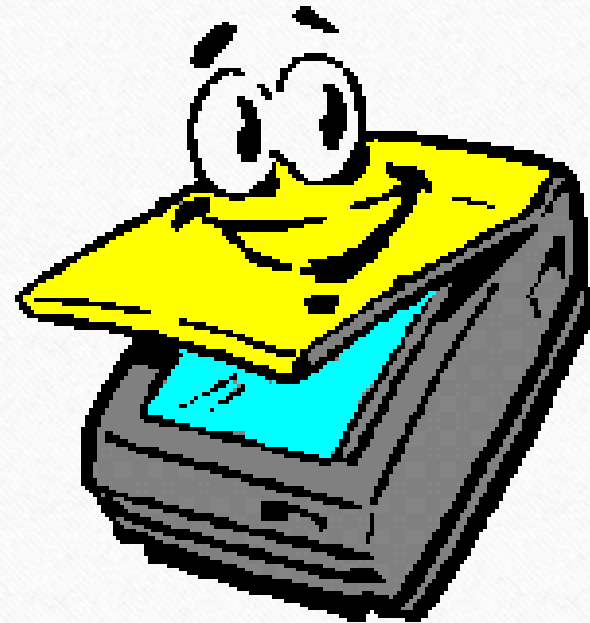
Legality

- SC Public Records Act
 - Section 30-4-20(c) definition of a Public Record: “includes all books, papers, maps, photographs, cards, tapes, recordings, or other documentary materials regardless of physical form or characteristics prepared, owned, used, in the possession of, or retained by a public body...”
 - Section 30-1-90 Archives shall assist in creating, filing and preserving records; inventories and schedules.
- Freedom of Information Act
 - Section 30-4-10 – 30-4-165 supports government accountability and the rights of citizens to inspect public records.
- Uniform Electronic Transactions Act
 - Section 26-6-10 – 26-6-210 elevates electronic records and signatures to the same level as their paper counterparts.

Digitization

(Look before you leap!)

- The process of transferring paper records to electronic records
- Look at your retention schedules **BEFORE** you digitize!
 - What is the retention period?
 - How much room do the physical records occupy?



ARM-13- Authorization for Disposal of Original Paper Records Stored As Digital Images

SC DEPARTMENT OF ARCHIVES & HISTORY AUTHORIZATION FOR DISPOSAL OF ORIGINAL PAPER RECORDS STORED AS DIGITAL IMAGES	1. RECORD GROUP NUMBER: _____
RETURN TO: SC Department of Archives & History Records Services Branch 8301 Parklane Road Columbia, SC 29223-4905 Telephone: 803-896-6123 FAX: 803-896-6138	INSTRUCTIONS 1. Complete one form for each record series. 2. Complete all of Part I. 3. Under Part II, check box A or box B, as appropriate, and sign. 4. Send the form to the address at left. 5. Do not destroy the paper records until we return the form to you with Part III completed. 6. Upon receipt of the form, destroy the records, complete Part IV, and retain the form permanently to document the disposal.

PART I - IDENTIFICATION OF RECORD

2. Name of State Agency or Local Government	3. Name of the Division, Section, or Office
4. Record Series Title	5. Schedule Number
6. Inclusive dates of paper records to be destroyed	7. Cubic feet of records to be destroyed (estimate)
8. Retention period (If less than 10 years, check box A under Part II below. If 10 years or more, check box B.)	9. Is this a vital record? (Essential to the continuity of services during a disaster or to the restoration of daily business when it has been interrupted) <input type="checkbox"/> YES <input type="checkbox"/> NO
10. Are security copies of the digital records and indexes being placed in off-site storage? <input type="checkbox"/> YES <input type="checkbox"/> NO	11. If yes, where are the security copies being stored?
12. Name of Person Completing Part I	13 Telephone number

PART II - CERTIFICATION

RECORDS WITH A RETENTION PERIOD OF LESS THAN 10 YEARS

- A. ☐ I certify that I am authorized to act for my government body in the retention and disposition of records identified in Part I of this form and that the digital image records have been visually inspected and are legible and correct.

RECORDS WITH A RETENTION PERIOD OF 10 YEARS OR MORE

- B. ☐ I certify that I am authorized to act for my government body in the retention and disposition of records identified in Part I of this form and that my Agency or local government will comply with items 1-7 on page 2 of Public records information leaflet no. 13, *Public records stored as digital Images: policy statement* (revised 24 June 2005).

14. Name/title of authorized state agency or local government representative:

15. Signature:

16 Date

PART III - STATE ARCHIVES APPROVAL

17. Disposal of the original (paper) records identified in Part I is

☐ APPROVED

☐ NOT APPROVED

18. Reason for non-approval

19. Signature of State Archives representative

20. Date

PART IV - DISPOSAL VERIFICATION

I have properly disposed of the paper records identified in Part I

21. Signature of person disposing of records

22. Disposal date.

Leaflet #13- Public Records Stored As Digital Images

- Ensure the production of appropriate indexes or other finding aids that will provide access to the information contained in the records
- Maintain security copies of the digital records and indexes in a secure off-site location
- Migrate and convert both the working and security copies of the digital records and indexes either every 10 years or sooner if access to them is no longer possible because the digital imaging records system has been upgraded or changed

Leaflet #13 (continued)

- Sample both the working and security copies of the digital records and indexes at least once a year to make sure the data is still readable and recopy immediately if loss of information is detected
- Certify that the digital image records have been visually inspected and are legible and correct
- Certify that they have established written procedures and maintain written documentation of compliance with 2-5 above
- Obtain an authorization for disposal of original records *in advance* from the South Carolina Department of Archives and History

Format Obsolescence

- What is it?
 - When a file format is no longer supported
- When does it happen?
 - Constant
- Prevention
 - Know your formats
 - Text files, graphics files, data files, spreadsheet files, video and audio files, markup languages
 - Limit your formats

Example of a wrong program

[illegible]

‘Born Digital’



- Records that are created, used, stored, and destroyed in electronic format only
 - For instance, databases, spreadsheets, email, etc.
- Require same organizational criteria as digitized documents

File Naming

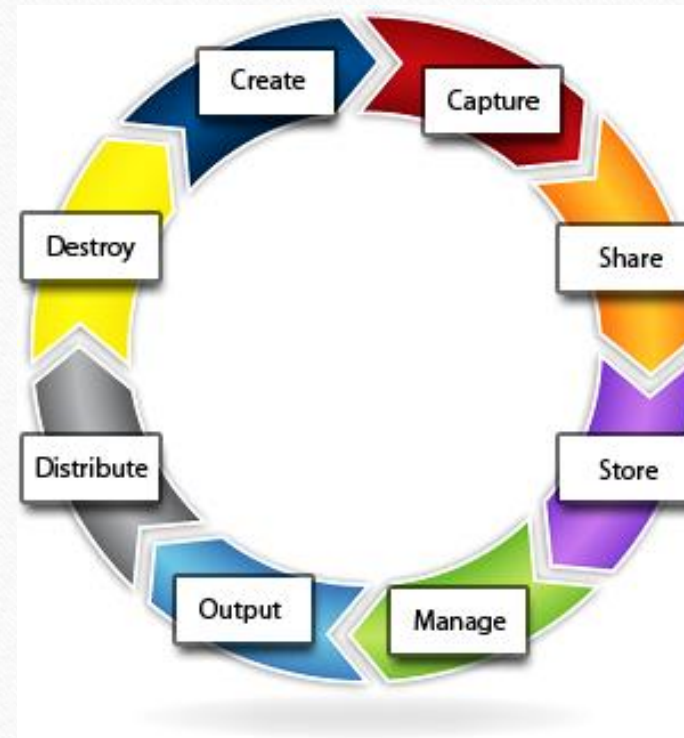


- Naming Conventions

- Consistency is key
- Tie the files/folders to their paper counterparts and to other files on the server
- Use file names to determine official/record copy
- Think longevity
- Create an index

EDM systems

- Benefits
 - Manage documents for you
 - Save employee time
- Questions to ask vendor
 - Is the software proprietary?
 - Is there an option to delete records?
 - What happens if the company ceases to exist?



Cloud Computing

- Pro
 - Cheap
 - Convenient (BYOD)
 - Centralized IT support
- Concerns
 - Where is your data?
 - Enforcing retention
 - Truly deleted?
 - Who owns the data?
 - What if it gets hacked?



E-mail and Social Media: Platform vs. Public Record

- Microsoft Outlook, G-mail, Facebook, Twitter, Instagram, etc. are platforms.
- There is no one retention period for either 'e-mail' or 'social media'
- The information produced or shared within the system may be considered a 'public record'
- 'E-mail' and 'social media' are not individual record series'.
 - **Retention is based on content** and may fall under several different record series'.

Determining the Value of Records, or, What would you do with it if it were paper?

- Values of Records
 - Administrative
 - Fiscal
 - Legal
 - Historical
- Some of the most common record types in e-mail:
 - Correspondence (Executive and Non-executive levels)
 - Agendas and/or meeting minutes
 - Policy files/directives
 - Project files/documents, etc.

What is NOT considered a public record?

- Spam
- Listservs
 - IF the recipient does not respond to the e-mail
- Vendors
 - IF the e-mail is unsolicited and does not result in any follow-up
- Personal e-mails
 - Please DO NOT use a work e-mail to send or receive personal e-mails
- Convenience Copies



Who is responsible for e-mail?

- Sent from Inside the Agency:
 - If the message is complete and unaltered, the sender can be responsible for maintaining it.
 - If the message is changed or replied to, the receiver (aka the new sender) can be responsible for maintaining it
 - **Note:** if there are multiple replies, between several people, only the final version of the e-mail needs to be kept. Provided that it contains ALL of the replies and the original message.
- Sent from Outside the Agency:
 - It is the responsibility of the person who receives the e-mail.
 - **Note:** If the person receiving the message is not authorized to respond to the e-mail and forwards the message to someone else, the person receiving the forwarded message is responsible for maintaining it.
 - If sent to multiple people, only one copy needs to be kept.

What parts of the e-mail need to be retained?

- Short Answer: All of it
- Long Answer:
 - Recipient and Sender
 - Full names and e-mail addresses
 - Each recipient, if sent to multiple people
 - Date and time of receipt
 - Body of e-mail
- Subject line
- Any attachments
 - Official copies of attachments may be kept elsewhere, but some record of what was attached needs to be kept.

How to save e-mail

- Option 1: Print e-mail
 - Not an ideal solution, but it is still an option
- Option 2: Move the e-mail out of inbox and onto another portion of the server
 - This includes all the body of the e-mail as well as all metadata and attachment(s)
- Option 3: Employ an EDM system to deal with e-mails for you.
 - **Note:** An e-mail inbox is NOT an EDM system. E-mails should not be left in an inbox longer than necessary, especially if an e-mail needs to be retained for a long period of time.
- Option 4: Any mix of the other options.

Social Media Retention Policy Starter Questions

- Who in the agency can access agency social media accounts?
 - **Note:** This policy should only apply to agency social media accounts. It does not apply to personal social media accounts.
- What retention schedule best describes agency social media accounts?
- How will the agency handle comments and replies?
- Can the agency employee use Likes, Follows, etc.?
- What will the agency do about inappropriate content?

Who and What?

- Who is authorized to use agency social media accounts?
 - It is best to authorize fewer people to use agency social media accounts. This will help ensure appropriate use of social media.
 - The exception being agencies that maintain multiple accounts in the same platform. Multiple people may be authorized to use the accounts; they should all be made aware of any agency social media policy or guidelines.
- What retention schedule best describes agency social media use?
 - Press Releases
 - Photographs
 - Correspondence

Public Interaction

- Decide how the agency will handle comments.
 - Telephone
 - E-mail
 - Direct Messaging
 - In the comments thread?
- Likes, Follows, etc.
 - There should be a general policy of neutrality to outside politics and agencies. Keep interaction limited to organizations or agencies within the same field of practice.

How to Handle Inappropriate Content

- Inappropriate content should be removed in a timely fashion. But, a record of the inappropriate content may be kept elsewhere.
 - If necessary, keep a record of what the content was, what form it was in (post, comment, etc.), what platform it was on and when it was posted. This information can be kept elsewhere on the server, but out of public view.

Transferring Permanent Electronic Records to the Archives



SC Department of Archives & History

Electronic Records Transmittal Form

Transmit Records To: South Carolina Department of Archives & History Records Management 8301 Parklane Rd Columbia, SC 29223-4905 Telephone: 803-896-6119 Fax: 803-896-6138 E-mail: jhills@scdah.sc.gov	Instructions: 1) Decide which records are ready to be transferred. 2) With the help of SCDAH, determine the best method of transfer for the chosen records. 3) Complete the following transmittal form. 4) Please complete one form per retention schedule. 5) Send the completed form and transfer the electronic records to the Archives.
---	--

Part I: Agency Information

1. Record Group Number:	2. Date of Transfer:
3. Agency Name:	4. Division Name:
5. Address:	6. Name of Records Officer (RO):
7. Records Officer Telephone Number:	8. Records Officer Signature:
9. Records Officer Email Address:	
10. Name of Transfer Contact (if different from RO):	11. Telephone Number:
12. Transfer Contact Email Address:	

Part II: Record Information

13. Retention Schedule Number associated with these records:	
14. Retention Schedule Title associated with these records:	
15. Variant Title (Within Agency):	
16. Estimated size of Transfer (MB):	17. Inclusive Dates:
18. Electronic Media included (Please check all that apply):	19. To the best of your knowledge, do these records contain Personally Identifiable Information (PII): <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> Tape <input type="checkbox"/> CD/DVD <input type="checkbox"/> Hard drive <input type="checkbox"/> Removable Hard drive <input type="checkbox"/> Other	If yes, what kind? (Please check all that apply): <input type="checkbox"/> Social Security Numbers <input type="checkbox"/> Credit Card Numbers <input type="checkbox"/> Passwords or PINs <input type="checkbox"/> Other Please describe:
20. File Format(s) included (Please check all that apply):	
<input type="checkbox"/> PDF or PDF/A <input type="checkbox"/> Microsoft Office <input type="checkbox"/> Word <input type="checkbox"/> Excel <input type="checkbox"/> PowerPoint <input type="checkbox"/> Access <input type="checkbox"/> Publisher <input type="checkbox"/> Images <input type="checkbox"/> JPEG <input type="checkbox"/> TIFF <input type="checkbox"/> PNG <input type="checkbox"/> Other <input type="checkbox"/> Database (.accd, .mdb, .dbf, .sql) <input type="checkbox"/> Email (.pst files) <input type="checkbox"/> Audio (.wav, .aiff, .wma, .mp3, .m4a) <input type="checkbox"/> Video (.avi, .mp4, .mov, .wmv) <input type="checkbox"/> Other Please describe:	

Questions?

- Jessica Hills
- (803) 896-6119
- jhills@scdah.sc.gov

<https://scdah.sc.gov/records-management/electronic-records/electronic-records-management-guidelines>