

CITY OF SPOKANE ADMINISTRATIVE POLICY AND PROCEDURE	ADMIN 0260-14-06 LGL 2014-0019
TITLE: Imaging and Destruction of Paper Records - "Scanning and Tossing" EFFECTIVE DATE: August 12, 2014 REVISION EFFECTIVE DATE: N/A	

1.0 GENERAL

1.1 This policy outlines the minimum requirements the City must meet in order to lawfully destroy paper-based source records after they have been converted to a digital format by imaging (scanning).

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2.0 DEPARTMENTS/DIVISIONS AFFECTED

This policy and procedure shall apply to all City divisions and departments.

3.0 REFERENCES

Chapter 40.14 RCW
Chapters 434-662 and 434-663 WAC
Administrative Policy 0260-07-02 "Off-site Records Storage"
Administrative Policy 0260-12—5 "Public Records Management Program"

4.0 DEFINITIONS

4.1 "Archival records" are those public records of state and local government agencies which are determined by the state archivist as having continuous historical value and must be permanently preserved and have been or may be transferred to the custody of the State division of archives after their approved retention has been met.

- 4.2 "Lossless compression" recreates a compressed file as an identical match to its original form. All lossless compression uses techniques to break up a file into smaller segments, for storage or transmission, that get reassembled later.
- 4.3 "Lossy compression" is a technique that does not decompress data back to one hundred percent (100%) of the original. Lossy methods provide high degrees of compression and result in smaller compressed files, but there is a certain amount of visual loss when restored.

5.0 POLICY

- 5.1 It is the policy of the City of Spokane to comply with state requirements when destroying paper-based source records after they have been converted to a digital format by imaging (scanning).

6.0 PROCEDURE

6.1 "Scan and Toss" Checklist.

6.1.1 Departments shall complete the Minimum Requirements to the "Scan and Toss" Checklist in conjunction with the Information Technology ("IT") Department and submit the checklist to the City Clerk or designee. The checklist shall be signed by the department head or designee.

6.1.2 The checklist shall be approved by the City Clerk or designee prior to scanning of paper records.

6.2 The disposition authority number (DAN) for paper records that have been scanned and then are to be destroyed is: GS50-09-14.

6.3 What Records Are Eligible For "Scanning and Tossing"?

6.3.1 Eligible records MUST be Non-Archival and covered by a current, approved records retention schedule.

6.3.2 The City shall use only records retention schedules approved for its use by the Local Records Committee in accordance with RCW 40.14.070. Current approved records retention schedules for local government agencies are available on Washington State Archives' website at www.sos.wa.gov/archives.

6.3.3 Archival records MUST not be destroyed.

- a. The City may scan Archival records in accordance with state requirements and this policy.
- b. However, after imaging is completed and verified, the department shall request that the City Clerk or designee arrange for appraisal and/or transfer of both the paper and the images to Washington State Archives for preservation.

6.4 How Do The Records Need To Be Scanned?

6.4.1 Records MUST be scanned in a systematic and consistent fashion that ensures a complete and accurate copy of the source record.

6.4.2 IT Requirements?

Agencies should develop written quality control procedures and work instructions to ensure a consistent capture of complete and accurate copies of original records. Train all staff with scanning responsibilities to ensure that they are familiar with these requirements and procedures. *Agencies are not required to use any specific systems, applications, or scanners.*

Examples of specific quality control procedures are:

Enhancements or other manipulations of the scanned images (such as de-skew, de-speckle, etc.) in order to improve the quality of the resulting image.

Routine use of scanning targets to verify configuration settings.

Visual comparisons and inspections of each imaged record and source document, or of selected images and source documents.

Regular calibration and testing of systems and scanners.

Periodic checks that the indexing/metadata is accurate and appropriate.

In instances where the source document cannot be captured completely and accurately, the image should be labeled or tagged as "best scan possible".

If vendors are doing the imaging: vendors are to comply with the same requirements as above and be approved by the IT Department.

6.5 What Formats Should Be Used?

6.5.1 There are some differences between the most commonly used formats. Formats are subject to changes and updates, and newer versions may not always be backwards compatible or be suitable for long-term preservation.

6.5.2 For shorter-term retention (fewer than six (6) years total), either a lossless or lossy image format may be used. Acceptable file formats include:

TIFF, PNG
 PDF, PDF/A
 JPEG, JPEG 2000

6.5.3 Long-term records (more than six (6) years total retention) require lossless image formats in order to ensure preservation. The current recommended formats are:

- TIFF (Group 4 for Black & White (bitonal) images; Group 5 for grayscale and color images).
- PNG
- For Archival images that are to be transferred to Washington State Digital Archives, the recommended format is TIFF (Group 4 or Group 5 for scanned images).
- If a department chooses to use data compression to save space, a lossless compression method **MUST** be used for long-term records.

Image Density (Resolution) Table (Chapter 434-663 WAC) OUTPUT	DENSITY
Black & White (Bitonal) (fonts no smaller than 6-point)	Minimum of 200 DPI Recommended 300 DPI
Black & White (Bitonal) (maps, engineering drawings, and other documents containing fonts smaller than 6-point, fine detail, or poor contrast)	Minimum of 300 DPI Recommended 300 DPI
Grayscale 8-bit	Minimum of 200 DPI Recommended 300 DPI
Color 24-bit RGB	Minimum of 150 DPI Recommended 300 DPI

6.6 What About Organizing, Indexing and Metadata?

6.6.1 Indexing is a way to attach metadata that facilitates access, retrieval, and management of information. Developing a consistent structure is key to managing and maintaining images.

6.6.2 The department should develop consistent naming conventions and file/directory structures to facilitate organization, identification, access and retrieval for users.

6.6.3 Departments should capture appropriate business and recordkeeping metadata (such as type of record, Disposition Authority Number (DAN), destruction date, etc.)

6.7 How To Manage, Store, And Retain Images?

6.7.1 Images MUST be stored, maintained and accessible for the entire length of the required retention period. Departments need to factor in not only the retention period (e.g., six (6) years), but also the trigger or the cut-off that starts the retention clock. For example, a record with a minimum retention of “six years after life of building” would likely need to be retained for much longer than just six years.

6.7.2 Departments MUST retain legal custody of the imaged records even if outside providers are used to store / host the imaged records.

a. Contracts/agreements with outside providers shall require that legal custody of the records remains with the City and that all imaged records (including associated metadata) be returned to the City in a format accessible by the City, at the end of the contract / agreement.

b. Departments should undertake appropriate mitigation strategies to ensure that they can fully recover records (including associated metadata) which have not met their minimum retention period in the event of vendor failure.

6.7.3 Imaged records MUST be protected against alteration and/or deletion, damage, or loss throughout the entire retention period. Specific protective measures may include, but are not limited to:

a. Establishment of security protocols, and approved administrators and users.

b. Employment of system checks and error-checking utilities.

c. Implementation of back-ups and disaster preparedness measures.

d. Storage of a regular backup at least fifty (50) miles off-site to enable recovery and access to the imaged records in the event of a wide-spread disaster or emergency.

6.7.4 Imaged records MUST remain accessible for the minimum retention period. To address technology changes, departments are to either:

- a. Maintain the ability to retrieve and view imaged records in systems and file formats that the City is currently using; or,
- b. Migrate or export the record images (including associated metadata) to succeeding systems and file formats throughout their required retention periods.

6.7.5 It is recommended that a department use a records management application which has been certified as DoD 5015.2 compliant for the ongoing storage and management of the imaged records.

- a. A link to a list of DoD 5015.2-certified products is available at <http://jitc.fhu.disa.mil/cgi/rma/>.
- b. For Non-Archival records with a required retention of "Permanent" or "Life of the Agency", it is strongly recommended that the department create state standard-compliant thirty-five (35) millimeter security microfilm from the digital scans and transfer it to Washington State Archives' Security Microfilm vault in Olympia. This microfilm will be inspected for compliance and stored as a disaster backup at no cost.

6.8 When Can The Images Be Destroyed?

6.8.1 Imaged records are to be destroyed only after the minimum required retention period as specified by the approved records retention schedule currently in effect.

6.8.2 Records MUST NOT be destroyed when required for:

- a. Existing public records requests in accordance with chapter 42.56 RCW; or,
- b. Ongoing or reasonably anticipated litigation; or,
- c. Other legal requirements, federal statutes, grant agreements, etc.; or,
- d. Archival transfer.

6.8.3 If changes to the records retention schedules have occurred between the digitizing of the record and their planned destruction, and those changes have altered the minimum retention period (or

the Archival designation) of the imaged records, departments must follow the current approved records retention schedule.

6.8.4 Departments should follow defensible disposition practices for the destruction of imaged records. This includes following a regular and systematic schedule for destruction processes. These practices should be consistent with the City's procedures for the lawful destruction of public records in other formats.

6.8.5 Departments shall document the destruction of both paper and scanned records.

a. Documenting the destruction of public records, *including scanned images*, provides departments with evidence to prove that they retained their records for at least the minimum retention periods.

b. Departments shall document that the paper was converted and destroyed lawfully under the appropriate disposition authority, and that the images are also destroyed lawfully once the retention requirements have been met.

6.9 What to do with Archival Paper Records after Imaging.

6.9.1 Which records are Archival and which are Non-Archival?

The records retention schedules indicate which types of records have been designated as Archival and which have not. Copies of the current approved records retention schedules are available from Washington State Archives' website (www.sos.wa.gov/archives).

6.9.2 Do NOT destroy Archival paper records after scanning.

a. Departments can image paper records which have been designated as Archival (including Potentially Archival).

b. However, departments **MUST NOT** destroy these paper records after scanning, even if the department is following the state law "scanning" requirements and this policy.

6.9.3 Transferring Archival Paper Records to Washington State Archives.

a. If departments are scanning Archival paper records, they must notify the City Clerk or designee who will contact the Washington State Archives and will arrange to appraise the

paper records and possibly transfer the paper records to the State collection.

- b. Do not simply send archival records to the State Archives without notifying the City Clerk or designee first and coordinating the possible transfer.

6.9.4 Transferring the Digitized Records to Washington State Archives.

- a. As part of the appraisal process, Washington State Archives will also discuss with departments the possibility of transferring copies of the imaged records as well.
- b. Having the imaged copies not only facilitates easier access to the records, it also helps preserve the original paper records which will no longer need to be handled as often by the State Archives.

6.9.5 Additional advice regarding the management of public records is available from:

Washington State Archives:
www.sos.wa.gov/archives
recordsmanagement@sos.wa.gov

7.0 RESPONSIBILITIES

The City Clerk, with the assistance of the Director of Information Technology, shall administer this policy.

8.0 APPENDICES

Scan & Toss Checklist / Approval

APPROVED BY:



City Attorney

7/28/14

Date



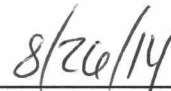
City Clerk

8/26/14

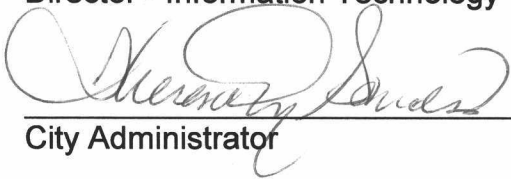
Date



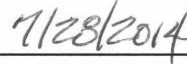
Director - Information Technology



Date



City Administrator



Date

CITY OF SPOKANE SCAN & TOSS CHECKLIST / APPROVAL

Department: _____

Date: _____

Contact Name: _____

Phone No. _____

Disposition Authority Number (DAN)	Record Series Title	Date Range of Records Requested For Destruction

1. ARE THEY ELIGIBLE?

- Only "NON-ARCHIVAL" records are eligible for early destruction after scanning.

2. ARE THE RECORDS BEING SCANNED TO ENSURE A COMPLETE AND ACCURATE COPY?

- Quality control procedures implemented to ensure capture of complete and accurate copies.
- Short-term records (6 years or fewer) imaged with an acceptable file format such as PDF, PDF/A, JPEG or TIFF.
- Long-term records (longer than 6 years) imaged with an acceptable lossless file format such as TIFF or PNG.
- Black & White (bitonal) documents containing fonts no smaller than 6-point and grayscale records scanned with a resolution of at least 200 dpi.
- Black & White (bitonal) maps, engineering drawings, and other bitonal documents containing fonts smaller than 6-point, fine detail, or poor contrast, scanned with a resolution of at least 300 dpi.
- Color records scanned with a resolution of at least 150 dpi. (300 dpi recommended).
- IT has approved equipment / methodology for scanning.

3. ARE IMAGES ACCESSIBLE AND PROTECTED FOR THE ENTIRE REQUIRED RETENTION PERIOD?

- Appropriate steps taken to protect images from deletion, alteration, or other damage/loss.
- Appropriate planning and strategies implemented for migration and technology changes.
- Appropriate index methodology to search documents.

Approved: _____
Department Head or designee

Date: _____

Approved: _____
IT Director

Date: _____

Approved: _____
City Clerk

Date: _____