Abstract:
The purpose of this Information Technology Policy (ITP) is to define the life cycle concept for the management of Commonwealth records that are in an electronic or digital format, and to provide a series of guidelines for the appropriate management of those records. This is to be read and applied in conjunction with Management Directive 210.5, “Records Management,” which establishes the Commonwealth Records Management Program for records in all formats.

Electronic record or data life cycle management is the management of information that is in an electronic format throughout its existence—from creation to final disposal—across various systems and media and within various operational constraints.

Defining stages in the life cycle of electronic records and mapping records to those stages is the key process in the effective and efficient management of electronic records. Electronic records management begins with an analysis of the activities, transactions, and systems that arrange the data into an electronic format and also includes an examination of the type, format, and location of records produced by the business processes. Records typically exist in one of four stages during their life cycle: creation, current, semi-current, and inactive. A slight variation with an alternative terminology may also be useful when defining the stages of an electronic record’s life cycle: online, near-line, offline, and expired. Likewise, it may be valuable for some of the more complex business processes to be broken into more than four stages.

The most critical factor in the successful management of electronic records is active management of the record at each stage in its life cycle, with recognition that each stage is interconnected from the rest. Planning for records that will require long-term or permanent preservation is to begin as early as possible and, unlike paper records, this process is to be active, not passive. The key to the successful management of electronic records is proactivity at every stage. For example, the cost of permanently preserving an electronic record may escalate dramatically based on a decision or minor cost avoidance during an earlier stage in the record’s life cycle. Likewise, the ultimate authenticity, integrity, or reliability of a record in one stage of its life may be determined by actions or a lack of action during an earlier stage.

General:
This ITP applies to all departments, boards, commissions and councils under the governor’s jurisdiction. Agencies not under the governor’s jurisdiction are strongly encouraged to follow this policy.

Policy:
Commonwealth agencies are to conduct a systematic analysis of each type of electronic record throughout each stage in its life cycle. The analysis is to include the following factors:
• Expected usage
• Business continuity demands
• Quantity or volume
• Number of copies or backups
• Storage location and description of storage
• Legal, auditable, and business risks associated with keeping or losing records
• Legal, auditable, and business costs associated with keeping or losing records
• Security and privacy concerns
• Migration and format issues

If the schedule does not already exist for the record, the required retention and disposition schedule is to be created based on the analysis of the records during each stage in the record’s life cycle. Likewise, the design of all systems and processes related to the record will take into consideration results of the analysis. The analysis is to occur prior to the implementation of any new business activity and/or related information technology systems.

The analysis will consider:
• the length of time a record is to be kept;
• the kind of system that will retain the record;
• the format to be used for retention of the record;
• the type of media and the type of backup media to be used;
• the security to be implemented during the holding of the record;
• the privacy procedures to be initiated;
• the scheduled migration of the record to the next system, with different parameters addressing each of the issues above; and
• the point at which the record will enter its final disposition (destruction or permanent retention).

Systems are to facilitate the migration of records to different formats or media as the records pass from one stage to another, as well as the purging of records as they reach the end of their life cycle.

Refresh Schedule:
All standards identified in this ITP are subject to periodic review and possible revision, or upon request by the Enterprise Architecture Standards Committee (EASC).

Exemption from This Policy:
In the event an agency chooses to seek an exemption, for reasons such as the need to comply with requirements for a federally mandated system, a request for waiver may be submitted via the Commonwealth of PA Procurement and Architectural Review (COPPAR) process. Requests are to be entered into the COPPAR Tool located at http://coppar.oa.pa.gov/. Agency CIO approval is required. Contact your agency CoP Planner for further details or assistance.

Questions:
Questions regarding this policy are to be directed to RA-ITCentral@pa.gov.

References:
ITP-INFRM004: Management of Web Records
ITP-INFRM005: System Design Review of Electronic Information Systems
MD 210.5: Records Management