

Information Technology Policy

The Life Cycle of Records: General Policy Statement

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ITP-INFRM001

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Category
Information

Supersedes
None

Contact
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1. Purpose

This [Information Technology Policy \(ITP\)](#) maintains the Data Life Cycle Management 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 ITP shall be read and applied in conjunction with [Management Directive 210.5, The Commonwealth of Pennsylvania State Records Management Program](#), which establishes the Commonwealth Records Management Program for records in all formats.

2. Scope

This ITP applies to all offices, departments, boards, commissions, and councils under the Governor's jurisdiction (hereinafter referred to as "agencies"). Agencies not under the Governor's jurisdiction are strongly encouraged to follow this ITP.

Third-party vendors, licensors, contractors, or suppliers shall meet the policy requirements of this ITP that are applicable to the products and services provided to the Commonwealth.

3. Definitions

Data Life Cycle Management: 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.

Agency Records Coordinator: The employee appointed by the agency head to have agency-wide responsibility for managing and coordinating the agency's records management program. See [Manual 210.7, State Records Management Manual](#).

4. Background

Defining stages in the Data Life Cycle for [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 technical or business processes.

Records typically exist in one of four stages during their life cycle: creation, active use, inactive use, and disposition. A slight variation with 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 technical or 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 electronic record at each stage in its life cycle, with recognition that each stage is interconnected from the rest. Planning for electronic records that will require long term or permanent preservation shall begin as early as possible and, unlike paper records, this process shall be active, not passive. 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 an electronic record in one stage of its life may be determined by actions or a lack of action during an earlier stage.

5. Policy

Agencies shall conduct a systematic analysis of each type of electronic record throughout each stage in its life cycle. The analysis shall include the following factors:

- expected usage; business continuity demands;
- quantity or volume;
- number of copies or backups;
- storage location and description of storage;
- audit requirements;
- administrative, fiscal, and legal value of records;
- designation as vital records;
- 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; and
- migration and format issues.

If the schedule does not already exist for the record, the required retention and disposition schedule shall be created by the Agency in coordination with the appropriate Agency Records Coordinator based on the analysis of the records during each stage in the record's life cycle. Likewise, the design of all systems and technical or business processes related to the record shall take into consideration results of the analysis. The analysis shall occur prior to the implementation of any new business activity or related information technology systems.

The analysis shall consider:

- the length of time a record shall be kept;
- the type 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).

Agencies shall ensure systems facilitate the migration of electronic records to different formats or media as the electronic records pass from one stage to another, as well as the purging of electronic records as they reach the end of their life cycle.

6. Responsibilities

6.1 Agencies shall:

- Conduct a systematic analysis of each type of electronic record throughout each stage in its life cycle.
- Create and adhere to retention schedules for records where they do not already exist.
- Ensure systems facilitate the migration of electronic records to different formats and the eventual purging of records.

6.2 Office of Administration, Office for Information Technology shall:

Comply with the requirements as outlined in this ITP.

6.3 Third-party vendors, licensors, contractors, or suppliers shall:

Comply with the requirements as outlined in this ITP that are applicable to the products and services provided to the Commonwealth.

7. Related ITPs/Other References

- Definitions of associated terms of this policy are published on the Office of Administration's public portal: <http://www.oa.pa.gov/Policies/Pages/Glossary.aspx>
- Commonwealth policies, including Executive Orders, Management Directives, and IT Policies are published on the Office of Administration's public portal: <http://www.oa.pa.gov/Policies/Pages/default.aspx>
- [*Management Directive 210.5 Amended, The Commonwealth of Pennsylvania State Records Management Program*](#)
- [*Management Directive 205.34, Amended Commonwealth of Pennsylvania Information Technology Acceptable Use Policy*](#)
- [*Manual 210.7, State Records Management Manual*](#)
- [*Manual 210.8, Vital Records Disaster Planning*](#)
- [*ITP-ACC001, Information Technology Digital Accessibility Policy*](#)
- [*ITP-INF015, Policy and Procedures for Identifying, Classifying, and Categorizing*](#)

[Commonwealth Electronic Data](#)

- [ITP-INFRM004, Management of Web Records](#)
- [ITP-INFRM005, System Design Review of Electronic Information Systems](#)
- [ITP-SEC019, Policy and Procedures for Protecting Commonwealth Electronic Data](#)
- [ITP-SEC031, Encryption Standards](#)

8. Authority

[Executive Order 2016-06, Enterprise Information Technology Governance](#)

9. Publication Version Control

It is the [Authorized User](#)'s responsibility to ensure they have the latest version of this publication, which appears on <https://itcentral.pa.gov> for Commonwealth personnel and on the Office of Administration public portal:

<http://www.oa.pa.gov/Policies/Pages/default.aspx>. Questions regarding this publication shall be directed to RA-ITCentral@pa.gov.

10. Exemption from this Policy

In the event an agency chooses to seek an exemption from the guidance within this ITP, a request for a policy waiver shall be submitted via the enterprise IT policy waiver process. Refer to [ITP-BUS004, IT Policy Waiver Review Process](#) for guidance.

This chart contains a history of this publication's revisions. Redline documents detail the revisions and are available to CWOPA users only.

Version	Date	Purpose of Revision	Redline Link
Original	09/21/2007	Base Document	N/A
Revision	11/18/2010	ITP Refresh	N/A
Revision	06/17/2021	ITP Refresh <ul style="list-style-type: none"> • Added to ITP Template • Added third-party vendors to Scope and Responsibilities • Added Definitions • Updated Related ITPs and Exemption 	N/A
Revision	01/20/2023	ITP Refresh <ul style="list-style-type: none"> • Added definition for Agency Records Coordinator • Moved information from policy to newly added background section • Updated lifecycle stages to match those in Manual 210.7, State Records Management Manual • Added additional factors for analysis • Updated responsibilities • Updated references 	<u>Revised IT Policy Redline <01/20/2023></u>