Abstract:
Records management is an important, yet often overlooked, element of any new electronic information system. This Information Technology Policy (ITP) addresses the components of proper records management throughout the design phase of information system development. In addition to specific parameters in the Policy section below, the attached questionnaire STD-INFRM005A, System Design Review of Electronic Information Systems, will assist planners, in accordance with Commonwealth records retention and disposition requirements, with assessing an electronic information system’s ability to maintain records within a specified system.

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:
New information systems are to address records management needs as a part of cost estimates and high-level project objectives and descriptions during the Communities of Practice (CoP) or other internal and external reviews utilizing the attached worksheet, STD-INFRM005A.

New information systems or major enhancements to existing systems, whether custom-developed or commercial-off-the-shelf (COTS) package implementations, are to address records retention throughout the course of its development or implementation life cycle in the following ways:

- The attached worksheet, STD-INFRM005A, is to be completed before final approval and implementation. If records within the system are scheduled for retention beyond five years by their associated records retention and disposition schedule, then a more extensive analysis is to be completed as outlined by the template.

- Requirements management plans and subsequent requirements development are to take into account records retention specifications. Records retention specifications are to:
  - Identify any records to be created by, or maintained in the system.
  - Determine if these records are on either the general or the specific agency’s approved records retention and disposition schedule. If such a schedule does not exist for the specified records, then the retention requirements are to be reviewed in accordance with the policies and procedures in Management Directive (MD) 210.5, “Records Management,” in order to establish a record retention schedule.

- Subsequent system life cycle activities (e.g., software design, infrastructure specification, or content) are to recognize and fulfill the records retention requirements described above.
For those systems for which it is determined that long-term or permanent records exist (as defined in STD-INFRM005A), schedule an electronic records review with the agency records coordinator and an archival appraisal with the Pennsylvania Historical and Museum Commission. At the review, the following records retention topics are to be covered by the agency:

- Identify the person(s) responsible for the content of or creation of the records in the system and identify the specific organizational unit or program responsible for the records and specify whether this responsibility remains constant throughout the life of the records. The role of outside vendors is to be included if they have responsibilities to maintain the records at any stage in their life cycle.

- Explain how the system will comply with the retention and disposition schedule for each series of records in the system. The composition or components of a record in a database may be dynamic, and different data or parts of records may have varying retention periods.
  - How will records scheduled for disposal be identified and how will the system fulfill the implementation of the schedule?
  - How often will this disposal occur, (i.e., daily, weekly, monthly, or annually, based on the date associated with the record)?
  - How will the date of record be determined and maintained within the system?

- Provide information for the maintenance of the records for their full life cycle. If records are categorized and stored according to different levels or phases of activity (i.e., active, semi-active, inactive), explain maintenance accession for each phase. Will different formats, platforms, software, and/or media be used to maintain the records during the various phases?

- Explain how the authenticity of records will be maintained throughout their life cycle.

- Explain consideration for the migration of records to future hardware and software platforms. Systems with records which are to be retained for ten years or longer are to include a discussion of the strategy which will be used to plan and fund migrations. Systems with permanent records may have very high costs associated with them and are to be reviewed carefully to ensure that short-term or immediate cost savings do not result in long-term inefficiencies. For example, records stored in standard (rather than proprietary) formats may be less expensive to migrate. Some media may be more expensive to maintain or refresh. Paper or other human readable formats may be required.

- Describe how records which are to be accessible to the public or other agencies will be maintained and made available while observing appropriate security and authenticity requirements.

**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/](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.

**Policy Supplements:**
[OPD-INFRM005A - System Design Review](#)