

Information Technology Policy

System Design Review of Electronic Systems

Number
ITP-INFRM005

Effective Date
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Category
Information

Supersedes
None

Contact
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1. Purpose

This Information Technology Policy (ITP) establishes the components of proper records management throughout the design phase of information system development. In addition to specific parameters in the Policy section below, *OPD-INFRM005A, System Design Review of Electronic Information Systems Questionnaire* will provide agencies with a method to assess an electronic information system's ability to maintain records in accordance with Commonwealth records retention and disposition requirements.

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. Policy

Records management is an important, yet often overlooked, element of any new electronic information system.

New information systems shall address records management needs as a part of cost estimates, high-level project objectives and descriptions, and during internal and external reviews utilizing *OPD-INFRM005A, System Design Review of Electronic Information Systems Questionnaire*.

New information systems or major enhancements to existing systems, whether custom-developed or [Commercial-off-the-Shelf \(COTS\)](#) package implementations, shall address records retention throughout the course of its development or implementation life cycle in the following ways:

- *OPD-INFRM005A, System Design Review of Electronic Information Systems*

Questionnaire shall be completed and submitted via email to RA-OAEDO@PA.GOV before the implementation of an electronic information system. If records within the system are scheduled for retention beyond ten (10) years by their associated records retention and disposition schedule, a more extensive analysis shall be completed as outlined by the questionnaire.

- Requirements management plans and subsequent requirements development shall take into account records retention specifications. Records retention specifications shall:
 - 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, the retention requirements shall be reviewed in accordance with the policies and procedures in *Management Directive (MD) 210.5 Amended, The Commonwealth of Pennsylvania State Records Management Program*, in order to establish a record retention schedule.
- Subsequent system life cycle activities (e.g., software design, infrastructure specification, or content) shall 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 OPD-INFRM005A), agencies shall schedule an electronic records review with the agency records coordinator and an archival appraisal with the Pennsylvania Historical and Museum Commission (PHMC) in accordance with the guidance provided in [*MD 210.5 Amended, The Commonwealth of Pennsylvania State Records Management Program*](#). At the review, the following records retention topics shall 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 shall be included if they have responsibilities to maintain the records at any stage in the record's lifecycle.
- 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 according to requirements identified in [*ITP-INFRM001, The Life Cycle of Records: General Policy Statement*](#). If records are categorized and stored according to different levels or phases of activity (i.e., creation, active use, inactive use, and disposition), explain maintenance accession for each phase. Determine the different

formats, platforms, software, or media that may 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 that shall be retained for ten (10) years or longer shall include a discussion of the strategy that 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 formats, 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 that may be accessible to the public or other agencies will be maintained and made available while observing appropriate security and authenticity requirements.

4. Responsibilities

4.1 Agencies shall:

- Address records management needs for new systems or major enhancements to existing system as a part of project cost estimates, objectives, requirements, implementation, and any subsequent system lifecycle activities.
- Identify any records to be created or maintained by new systems and determine if they are covered by any existing retention and disposition schedule. If they are not, a records retention schedule shall be established.
- Submit the completed *OPD-INFRM005A, System Design Review of Electronic Information Systems Questionnaire* to RA-OAEDO@PA.GOV prior to the implementation of any new information systems or major enhancements to existing systems.
- Adhere to the requirements of [MD 210.5 Amended, The Commonwealth of Pennsylvania State Records Management Program](#) for records subject to a records legal hold.
- Schedule a records review meeting with the Pennsylvania Historical and Museum Commission for those systems for which it is determined that long-term or permanent records exist.

4.2 Office of Administration, Office for Information Technology shall:

- Review completed INFRM005A, System Design Review of Electronic Information Systems Questionnaire forms as part of the established review processes.

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

- Comply with the requirements of this ITP that are applicable to products or services provided to the Commonwealth.

5. 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 205.34 Amended, Commonwealth of Pennsylvania Information Technology Acceptable Use Policy*](#)
- [*Management Directive 210.5 Amended, The Commonwealth of Pennsylvania State Records Management Program*](#)
- [*ITP-ACC001, Information Technology Digital Accessibility Policy*](#)
- [*ITP-INFRM001, The Life Cycle of Records: General Policy Statement*](#)
- *OPD-INFRM005A, System Design Review of Electronic Information Systems Questionnaire*

6. Authority

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

7. 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.

8. 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	06/25/2021	<ul style="list-style-type: none"> • ITP Refresh • Added Third-party vendors to Scope and Responsibilities sections • Updated Related ITPs/Other References • Updated Exemption section 	N/A
Revision	03/14/2023	<ul style="list-style-type: none"> • Added requirement to submit the completed OPD-INFRM005A via email to RA-OAODDT@pa.gov. • Updated Life-Cycle stages to match OCRIM terminology. • Updated responsibilities to reflect policy requirements. 	Revised IT Policy Redline <03/14/2023>