

[Last website update Oct. 2012]

The State Records Commission, pursuant to Iowa Code section 305.8(1)(a) and(g), is developing guidelines on agency maintenance of non-permanent records in electronic records keeping systems. The Commission is not yet prepared to adopt binding guidelines, in part, because it continues to solicit feedback and input from affected agencies. **The following guidelines should accordingly be viewed as informal advice and not as a binding statement of requirements.**

Questions or comments concerning the guidelines may be forwarded to jeffrey.dawson@iowa.gov.

**State Records Commission Recommended Guideline for the
Retention of State Records in Electronic Form**

The purpose of the State Records Commission, as defined in Iowa Code Chapter 305, is to adopt government information policies, standards, and guidelines to do all of the following:

- Provide for economy and efficiency in the creation, organization, maintenance, administrative use, security, public availability, and final disposition of government records.
- Ensure creation of proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of state government agencies to protect the legal and financial rights of the state and of persons directly affected by the government's activities.
- Identify and preserve state government records that document the history and development of the state.

In recent months the Commission has seen an increase in the number of records series retention and disposition schedules for records in electronic form being submitted for review and approval. We are also aware that many electronic records have no formally defined records schedules. Records schedules specifically define: a) the retention period for State records; and b) the ultimate disposition of the records (i.e. either destruction at a future date or permanent retention).

Iowa Administrative Code section 671—7.4(2) states that “a record scheduled for permanent preservation in an agency shall be retained in the agency in perpetuity.

- a. An agency shall maintain a record scheduled for permanent preservation in the agency in a manner that will ensure the continued availability of an accurate, authentic, reliable record in perpetuity.
- b. An agency shall make a record scheduled for permanent preservation in the agency available in perpetuity for public inspection and copying in accordance with agency fair information practices rules.”

Those records with a defined retention period and destruction date (referred to as non-permanent records) should meet the same criteria for availability and integrity for the duration of their retention period.

State Agency Responsibility for the Availability Electronic Records

It is the responsibility of state agencies to ensure that non-permanent records created and maintained in electronic systems remain accessible for their prescribed retention period. This requires taking into account the issues of refreshing, migration, backup, and security when planning, implementing, and administering electronic systems. Back-ups produced for system recovery purposes do not serve a recordkeeping function and do not substitute for security copies of records.

To ensure the accessibility of non-permanent records in electronic systems for the duration of the records' prescribed retention period, state agencies should establish internal procedures for creation, use, maintenance, storage, retention, preservation, and disposition of state records in electronic form. The procedures should:

- Integrate the management of electronic records with other records and information technology resources of the agency;
- Identify the electronic records created, used, received, or maintained by the agency to ensure the records appear on the agency's records retention schedules;
- Ensure the development and maintenance of documentation of electronic records systems used by the agency that specifies the characteristics necessary for reading or processing the records, including a narrative description of the system and the physical and technical characteristics of the records;
- Ensure the retention of the agency's electronic records until a disposition period has been approved by the State Records Commission;
- Ensure that an electronic record's content, structure, and context¹ are evident and easily retrieved and understood;
- Protect any confidential, privileged, proprietary, or security information;
- Provide for the management of records maintained on the agency's website to ensure that web content is trustworthy, complete, accessible, and durable for as long as the records retention schedule applicable to those records requires;
- Provide a security plan to prevent unintentional or unauthorized addition, modification, deletion, or corruption of electronic records and to ensure routine back-up of essential information against loss due to equipment malfunction, power interruption, human acts, and natural events;
- Provide for the transfer of long-term and permanent electronic records from an existing system to a new system if it is evident that the existing system (hardware, software or both) will become obsolete or inoperable;
- Ensure the agency's electronic records are readable and accessible for as long as the applicable records retention schedule requires; and

¹ Each record has three components, including **content** (substance of the record); **structure** (format of the data and internal organization of record content); and **context** (organizational, functional, and operational circumstances surrounding the record's creation, receipt, storage, use; also includes creation, modification, and disposition dates and record's relationship with other records.)

- Ensure the consideration of the following factors before the selection of a storage media or the conversion of an electronic record from one media to another:
 - Length of the retention period for the record;
 - Maintenance necessary for the entire life cycle of the record;
 - Cost of storing and retrieving the record;
 - Time needed to retrieve the record;
 - Portability of the medium, including the readability of medium by multiple manufacturers; and
 - Transferability of the record from one medium to another.