# Preliminary Planning for Electronic Records Management: Questions for IT and RM Staff

## Introduction

The following questions are intended to help Information Technology (IT) and Records & Information Management (RM) staff prepare to work together to manage electronic records. These are high-level issues that both teams should consider as they collaborate to establish or improve electronic records management in the agency.

## How does records management fit into your agency’s overall information management strategy?

Most information management programs are designed to maintain control of the information an organization collects, creates, receives, processes, uses and distributes. An effective program will provide easy access to information related to specific work tasks, reduce redundant information creation and storage, support reuse of relevant information, clarify ownership of policy and procedural information, and manage information throughout its lifecycle. Records management plays a key role in the agency’s overall information management strategy for several reasons:

* It brings critical business records under the control of the agency.
* It can provide a single point of access to important records, which saves storage space and backups, provides better access, version control and security, and reduces costs and confusion.
* It supports record integrity, authenticity, and reliability.
* It provides access to records throughout their lifecycle for use and reuse. It helps to protect against unauthorized alteration and revision and preserves records’ content, context, and structure.
* It supports compliance with approved agency retention schedules governing the retention, deletion, and transfer of Federal records.
* It helps your agency manage both electronic records and legacy hard copy files.

Records management is required of all Federal agencies. All records made or received by a Federal agency must be identified, categorized, retained, and disposed of in accordance with procedures authorized by the National Archives and Records Administration. Records document your agency’s organization, functions, policies, decisions, procedures, operations, and other activities – whether created or received by your agency – regardless of the media on which the records were recorded.

## How should your IT and RM organizations work together?

Most records are now created, stored, and shared electronically. Effective records management eases the burden and costs associated with electronic information by helping to identify, categorize, and determine the legal and business retention needs for each type of record. Incorporating records management requirements into systems, including records considerations into systems planning and lifecycle management, and practicing regular communication and coordination between IT and RM will help the agency meet its program and IT objectives while ensuring compliance with regulations.

## Who is on your information management team?

Do you have an effective team – including information technology, information security and privacy, records management, legal, finance, audit, and program staff – working together to plan for, implement, migrate and decommission information systems?

Each group – program, IT, RM, legal, security, and other staff – has requirements which are essential to the success of each project. By understanding their needs and working together to incorporate their requirements from the beginning of the project, we save time and resources, and we increase our likelihood of success.

By incorporating records management requirements into the process, we are more likely to ensure that the information we are collecting, storing, and using in the system will be the right information retained for the right amount of time. Understanding records management requirements will also help us delete expired data in a timely manner and ensure that records needed for the long term will be identified, preserved, and kept accessible for as long as they are required.

## Are your information security measures sufficient to support reliable and authentic records?

Information security is one of many primary points of shared interest and collaboration between records management programs and information technology organizations. If the agency’s systems cannot support the integrity of the records and provide ample evidence of their authenticity, the agency will be in a poor position to achieve its mission and protect the rights of citizens.

Records act as the “voice” of the agency in legal proceedings. As such, the information security of recordkeeping systems, and indeed, of the records themselves, is paramount in assuring that records will serve as authentic and reliable evidence of agency actions over time. Failure to ensure authenticity, reliability and integrity of electronic records through appropriate information security can call into question the recordkeeping practices of an agency and present substantial legal risk to the agency.

## Do you have a plan for long-term management and retention of electronic records?

Effective management of electronic records requires that the information be actively managed throughout its lifecycle: from creation, through all phases of access and use, to final disposition, whether that is permanent archival retention or eventual deletion.

It is important to understand the distinction between the lifecycle of records and the lifecycle of information systems that create, manage and use the records, as well as the lifecycle of any media on which the records are stored. The lifecycle of records often exceeds the lifecycle of the information systems, media, and formats in which the records were created or captured.

It is important to determine if the records will be needed beyond the life of the system where they are currently stored and, if necessary, to plan for the migration of the records to a new system before the current system is retired.

Migration strategies to counteract the hardware and software dependencies of electronic records are essential for the long-term management of records. When planning for both generic desktop applications and program-specific IT systems that generate electronic records, there are several issues to consider:

* Will the system/software changes cause your agency to re-think the record retention status of the information to be generated by the new system/software?
* Are all records from the old system/software going to be migrated to the new system/software? Will 100% of the record content and associated metadata successfully convert?
* Has the agency prepared for migration by mapping the data between the old and new system?
* How will the agency retain the old systems/software until an audit verifies successful record conversion from the old to the new system/software?
* Will the new system(s) require new or updated records schedules?

## How are you managing metadata?

As important components of information systems, metadata support record creators and users, and they are essential for effective records management. Metadata are a required part of a complete, reliable and authentic record. Metadata provide information about the context of the record, how the record was structured, and how it was accessed. If you do not capture the necessary metadata, you cannot capture a complete, reliable and authentic record.

For effective electronic records management, it is necessary to capture specific kinds of metadata for records, including unique identifiers, access restrictions, and retention and disposition information.

## Has your agency identified its electronic records?

In order to develop effective plans to manage electronic records, agencies need to identify the records they currently create, receive, and store. Your agency needs to assess the types of electronic records (what the records are, and how they are used to support the business), the formats in which the records are created or captured (word processing, spreadsheet, presentation, email, and other formats), how often the records are accessed/used for normal business and for FOIA requests, who manages the records, how the records are managed (and for what approved retention time), and how the records are secured and backed up.

## Are all your electronic systems and records covered by an approved, up-to-date retention plan?

All Federal records, including those created by, stored in, and managed by information systems, must be managed according to a records retention schedule that has been reviewed and approved by the National Archives and Records Administration. Records must be retained for the full, approved retention period and cannot legally be deleted before their approved retention time has expired. Permanent records (historical, archival records) are also identified and managed according to an approved retention plan and are transferred to the National Archives according to that approved schedule.

## How will you handle legal holds and other freezes?

Records needed for a specific court case, audit, or other purpose often have their retention times “frozen.” During a freeze, the records are tracked and managed in a way that protects them from deletion for the duration of the event, even if the records’ regular retention time expires during the time period of the event. RM, IT, audit, and legal staff must work together to manage and protect the affected records throughout the freeze/hold process.

## Have you reviewed NARA’s Universal ERM Requirements?

NARA provides its Universal Electronic Records Management (ERM) Requirements, which identify high-level business needs for managing electronic records. These baseline requirements are derived from existing NARA regulations, policy, and guidance.

The Universal ERM Requirements are a starting point for agencies to use when developing system requirements and procuring systems. RM and IT personnel should work with acquisitions staff to tailor any final system requirements.

The Universal ERM Requirements document, which includes an abstract, list of lifecycle requirements, list of transfer format requirements, and a glossary, is available for download at <https://www.archives.gov/records-mgmt/policy/universalermrequirements>