



Public Records Policy 02: *Digital Imaging*

Date Issued: 8/11/2014

Supersedes: This policy supersedes General Letter 2001-01: *Standards for the Use of Imaging Technology for Storage, Retrieval, and Disposition of Public Records: Policy Statement*, issued February 1, 2001.

Authority

The Office of the Public Records Administrator (OPRA) issues this policy under the authority granted by *Connecticut General Statutes (CGS) §11-8, §11-8a and §7-109*.

Scope

This policy applies to all executive branch state agencies, local government entities, and political subdivisions in Connecticut using imaging technology for the reformatting of analog public records. This policy does not address born digital records.

This policy does not supersede existing federal, state, or local laws and regulations that require the maintenance of public records and documents in a prescribed format.

Purpose

The purpose of this policy is to ensure the continued access and retrieval of digital images while protecting their authenticity, reliability, integrity, and usability.

1. Agency Requirements

Agencies are responsible for implementing appropriate policies, procedures, and business practices to ensure the authenticity, reliability, integrity, and usability of public records reformatted using digital imaging technology.

Note that if an agency contracts with a vendor for imaging services, it remains the responsibility of the agency to ensure that its vendor is in compliance with all applicable sections of this policy.

Agencies using digital imaging technology to reformat public records shall:

1. Establish and maintain a quality assurance process to ensure the creation of accurate and authentic digital images and accurate indexes and production metadata.
2. Create and maintain accurate and authentic digital images in accordance with accepted standards and best practices.
3. Create and maintain accurate indexes and production metadata to properly identify and retrieve digital images.
4. Store and protect digital images against file corruption, alteration, or deletion throughout the designated retention period.

5. Perform periodic backups of all digital images, associated indexes, and production metadata and maintain a geographically remote offsite backup copy to enable recovery and access in the event of a wide-spread disaster or emergency.
6. Perform and certify annual tests of backup media to ensure all files have been backed up and are readable.
7. Migrate digital images, associated indexes, and production metadata to a newer media platform or file format as needed to ensure the content remains accessible.
8. Define and document the normal operations and use of the imaging technology and electronic content management system to ensure system trustworthiness.
9. Maintain written policies and procedures documenting compliance with 1-8 above.

2. Retention and Disposition of Original Paper Records

2.1. Permanent/Archival Records. If records have permanent retention or are designated as archival, the agency may digitize the records, but shall retain security copies of the records in a human-readable storage medium approved by the Public Records Administrator, such as paper or microform. In certain cases, the Public Records Administrator or State Archivist may specifically require that the original paper format be retained.

2.2. Non-Permanent/Non-Archival Records. The Public Records Administrator may approve the disposal of original, non-archival records having a retention period of **less than permanent** and reformatted using imaging technology.

To dispose of paper records after reformatting, the agency shall:

1. Obtain prior authorization for disposal of the original paper records from the Public Records Administrator and State Archivist using form "Authorization for the Disposition of Original Paper Records Stored as Digital Images" (Form RC-108.1 for state agencies, Form RC-075.1 for municipalities).
2. Document that the original paper records were destroyed lawfully under the appropriate disposition authority. Destruction should be documented by recording the date of destruction on the form "Records Disposition Authorization" and attaching any supporting documentation (e.g., Certificate of Destruction); or alternatively, by following an established agency policy that defines how the agency documents its records destruction.

3. Retention and Disposition of Digital Records

After the approved disposition of original public records in paper format, the digital images shall be maintained in compliance with the retention requirements listed on the applicable records retention schedule issued by the Public Records Administrator in accordance with *CGS* §11-8, §11-8a, and §7-109.

The digital images shall be maintained for the minimum retention period as specified on the approved records retention schedule currently in effect. If changes to the records retention schedules occur between the digitization of the record and its planned destruction, and those changes alter the minimum retention period of the imaged record, the agency shall follow the current approved records retention schedule.

To dispose of digital images once the retention requirements have been met, the agency shall:

1. Obtain prior authorization for the disposal of the digital images from the Public Records Administrator and State Archivist using form "Records Disposition Authorization" (Form RC-108 for state agencies, Form RC-075 for municipalities).
2. Document that the digital images were destroyed lawfully under the appropriate disposition authority. The agency should follow defensible disposition practices for the destruction of digital images, which means a process by which content is systematically deleted with an audit trail that is legally admissible in court. Destruction should be documented by recording the date of destruction on the form "Records Disposition Authorization" and attaching any supporting documentation (e.g., Certificate of Destruction); or alternatively, by following an established agency policy that defines how the agency documents its records destruction.

4. Digital Imaging Standards

This policy shall be read together with the following standard to ensure a full understanding of agency requirements:

[Digital Imaging Standards](#)

Contact

If you have any questions regarding this policy, please contact our office at (860) 757-6540.

Approved by



LeAnn R. Power, CRM
Public Records Administrator

8/11/2014

Date