

TOWN OF WOODWAY

RESOLUTION 19-414

A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF WOODWAY ADOPTING AN IMAGING AND DISPOSITION OF PAPER RECORDS (SCAN & TOSS) POLICY

WHEREAS, the Town of Woodway wishes to ensure consistent application of the document retention requirements in Chapter 40.14 RCW, Chapters 434-662 and 434-663 WAC, and the Local Records Committee's retention schedules for local governments; and

WHEREAS, the Washington State Archives Division of the Office of the Secretary of State has published guidance on destruction of non-archival paper records after imaging, also known as "scanning and tossing"; and

WHEREAS, the Town of Woodway wishes to take implement this guidance in the form of a formal policy in order ensure compliance with applicable records retention requirements.

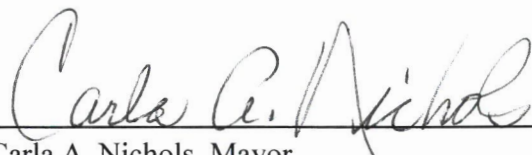
NOW, THEREFORE, the Town Council of the Town of Woodway does hereby resolve as follows:

Section 1. The Town of Woodway Imaging & Disposition of Paper Records (Scan & Toss) Policy, attached as Exhibit A, is adopted in its entirety.

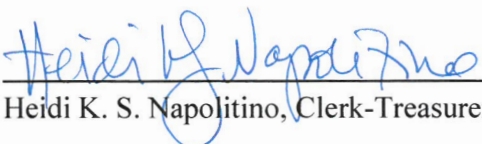
Section 2. The Town of Woodway Imaging & Disposition of Paper Records (Scan & Toss) Policy will be effective June 17, 2019.

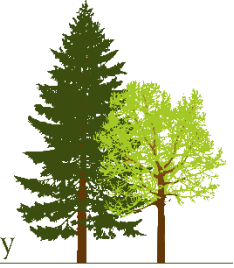
PASSED this 17th day of June 2019 by the Town Council of the Town of Woodway.

TOWN OF WOODWAY


Carla A. Nichols, Mayor

ATTEST:


Heidi K. S. Napolitano, Clerk-Treasurer



IMAGING & DISPOSITION OF PAPER RECORDS (SCAN & TOSS) POLICY

Purpose:

It is the policy of the Town of Woodway to comply with state requirements when destroying paper-based source records after they have been converted to a digital format by imaging (scanning). This “scan & toss” policy and procedure shall apply to all Town departments and provides the minimum requirements the Town must meet in order to lawfully scan & toss records.

The Clerk-Treasurer/Public Records Officer (or her/his designee) shall administer this policy.

References:

1. Washington State Records Retention Schedules
2. RCW Chapter 40.14: Preservation and Destruction of Public Records
3. WAC Chapter 434-662: Preservation of Electronic Records
4. WAC Chapter 434-663: Imaging Systems, Standards for Accuracy and Durability

Definitions:

1. “Archival records” are records that have permanent and/or historical value and are scheduled as archival. Long-term records are records having a retention period in excess of ten years. Permanent records are those records that are required by specific statute to be retained permanently.
2. “Imaged records” are records that have been converted to a digital format by imaging (scanning).
3. “Lossless compression” recreates a compressed file as an identical match to its original form. All lossless compression uses techniques to break up a file into smaller segments, for storage or transmission, that get reassembled later.
4. “Lossy compression” is a technique that does not decompress data back to one hundred percent (100%) of the original. Lossy methods provide high degrees of compression and result in smaller compressed files, but there is a certain amount of visual loss when restored.

Record Eligibility:

1. Archival v. Non-Archival Determination

The records retention schedules indicate which types of records have been designated as Archival and which have not. Copies of the current approved records retention schedules are available from Washington State Archives' website: www.sos.wa.gov/archives.

2. Records Eligible for “Scanning and Tossing” MUST be Non-Archival and covered by a current, approved records retention schedule.

a. The Town shall use only records retention schedules approved for its use by the Local Records Committee in accordance with RCW 40.14.070. Current approved records retention schedules for local government agencies are available on Washington State Archives' website at www.sos.wa.gov/archives.

b. The disposition authority number (DAN) for paper records that have been scanned and then are to be destroyed is: GS50-09-14.

3. Archival records MUST NOT be destroyed.

a. The Town may scan Archival records in accordance with state requirements and this policy.

b. After imaging is completed and verified, the department shall request that the Clerk-Treasurer or designee arrange for appraisal and/or transfer of both the paper and the imaged copies to Washington State Archives for preservation.

Procedures and Requirements:

4. Scan & Toss Checklist

a. Departments shall complete the Minimum Requirements to the Scan & Toss Checklist and submit the checklist to the Clerk-Treasurer or designee. The checklist shall be signed by the department head or designee.

b. The checklist shall be approved by the Clerk-Treasurer or designee prior to scanning of paper records.

5. Scanning Requirements

a. Records MUST be scanned in a systematic and consistent fashion that ensures a complete and accurate copy of the source record.

b. The Town shall develop written quality control procedures and work instructions to ensure a consistent capture of complete and accurate copies of original records; and train all staff with scanning responsibilities to ensure that they are familiar with these requirements and procedures. Per Washington State Archives - Agencies are not required to use any specific systems, applications, or scanners.

Examples of specific quality control procedures may include:

- Enhancements or other manipulations of the scanned imaged records (such as de-skew, de-speckle, etc.) in order to improve the quality of the resulting imaged records.
- Routine use of scanning targets to verify configuration settings.
- Visual comparisons and inspections of each imaged record and source document, or of selected imaged records and source documents.
- Regular testing of systems and scanners.
- Periodic checks that the indexing/metadata is accurate and appropriate.
- In instances where the source document cannot be captured completely and accurately, the imaged record should be labeled or tagged as "best scan possible".

c. If vendors are doing the imaging: vendors are to comply with the same requirements as above and must be approved by the Clerk-Treasurer.

6. Formatting Requirements

- a. There are some differences between the most commonly used formats. Formats are subject to changes and updates, and newer versions may not always be backwards compatible or be suitable for long-term preservation.
- b. In consultation with the Washington State Digital Archives, the Town has adopted the following standards for document imaging, which meet or exceed the standards in WAC 434-663.

Image Density (Resolution) Table

Type of Document	Density	File Type
Black & White (Bitonal) up to size 8.5” x 11”	300 dpi	Lossless PDF or PDF/A
Black & White (Bitonal) & Grayscale (maps, engineering drawings, and other documents containing fine detail or poor contrast) larger than size 8.5” x 11”	600 dpi	TIFF Group 4
Color – all sizes	600 dpi	TIFF Group 5

c. For maps and photos included in meeting packets, 300 dpi PDF or PDF/A is accepted.

7. Requirements for Organizing, Indexing, and Metadata

- a. Indexing is a way to attach metadata that facilitates access, retrieval, and management of information. Developing a consistent structure is key to managing and maintaining imaged records.

- b. Each department should develop consistent naming conventions and file/directory structures to facilitate organization, identification, access, and retrieval for users. It is recommended that the Clerk-Treasurer review all proposed naming conventions and file/directory structures for Town-wide consistency.
 - c. Each department should capture appropriate business and recordkeeping metadata (such as type of record, Disposition Authority Number (DAN), destruction date, etc.).
8. Requirements for Managing, Storing, and Retaining Imaged Records
- a. Imaged records **MUST** be stored, maintained, and remain accessible for the entire length of the required retention period.
 - i. Departments need to factor in not only the retention period (e.g., six (6) years), but also the trigger or the cut-off that starts the retention clock. For example, a record with a minimum retention of “six years after life of building” would likely need to be retained for much longer than just six years.
 - ii. To address technology changes, departments are to either:
 - 1. Maintain the ability to retrieve and view imaged records in systems and file formats that the Town is currently using; or,
 - 2. Migrate or export the imaged records (including associated metadata) to succeeding systems and file formats throughout their required retention periods.
 - b. Imaged records **MUST** be protected against alteration, deletion, damage, or loss throughout the entire retention period. Specific protective measures may include, but are not limited to:
 - i. Establishment of security protocols, and approved administrators and users.
 - ii. Employment of system checks and error-checking utilities.
 - iii. Implementation of back-ups and disaster preparedness measures.
 - iv. Cloud storage of a regular backup to enable recovery and access to the imaged records in the event of a wide-spread disaster or emergency.
 - c. Departments **MUST** retain legal custody of the imaged records even if outside providers are used to store/host the imaged records.
 - i. Contracts/agreements with outside providers shall require that legal custody of the records remains with the Town and that all imaged records (including associated metadata) be returned to the Town in a format accessible by the Town, at the end of the contract I agreement.

- ii. Departments should undertake appropriate mitigation strategies to ensure that they can fully recover records (including associated metadata) which have not met their minimum retention period in the event of vendor failure.
 - d. It is recommended that departments use a records management application which has been certified as DoD 5015.2 compliant for the ongoing storage and management of the imaged records.
 - i. A link to a list of DoD 5015.2-certified products is available at <http://jitc.fhu.disa.mil/projects/rma/reg.aspx>.
- 9. Disposition after Imaging: Non-Archival Records
 - a. Non-archival imaged records are to be destroyed only after the minimum required retention period as specified by the approved records retention schedule currently in effect.
 - b. Records **MUST NOT** be destroyed when required for:
 - i. Existing public records requests in accordance with chapter 42.56 RCW; or,
 - ii. Ongoing or reasonably anticipated litigation; or,
 - iii. Other legal requirements, federal statutes, grant agreements, etc.; or,
 - iv. Archival transfer.
 - c. If changes to the records retention schedules have occurred between the imaging of the record and their planned destruction, and those changes have altered the minimum retention period (or the Archival designation) of the imaged records, departments must follow the current approved records retention schedule.
 - d. Departments should follow defensible disposition practices for the destruction of imaged records. This includes following a regular and systematic schedule for destruction processes. These practices should be consistent with the Town's procedures for the lawful destruction of public records in other formats.
 - e. Departments shall document the destruction of both paper and scanned records.
 - i. Documenting the destruction of public records, including scanned imaged records, provides departments with evidence to prove that they retained their records for at least the minimum retention periods.
 - ii. Departments shall document that the paper was converted and destroyed lawfully under the appropriate disposition authority, and that the imaged records are also destroyed lawfully once the retention requirements have been met.
 - f. For Non-Archival records with a required retention of "Permanent" or "Life of the Agency", it is strongly recommended that the department create state standard-

compliant thirty-five (35) millimeter security microfilm from the imaged documents and transfer it to Washington State Archives' Security Microfilm vault in Olympia. This microfilm will be inspected for compliance and stored as a disaster backup at no cost.

10. Disposition after Imaging: Archival Paper Records.
 - a. Do NOT destroy Archival paper records after scanning.
 - i. Departments can image paper records which have been designated as Archival (including Potentially Archival).
 - ii. However, departments MUST NOT destroy these paper records after scanning, even if the department is following the state law scanning requirements and this policy.
 - b. Transferring Archival Paper Records to Washington State Archives.
 - i. If departments are scanning Archival paper records, they must notify the Clerk-Treasurer or designee who will contact the Washington State Archives and will arrange to appraise the paper records and possibly transfer the paper records to the State collection.
 - ii. Do not simply send archival records to the State Archives without notifying the Clerk-Treasurer or designee first and coordinating the possible transfer.
 - c. Transferring the Imaged Records to Washington State Digital Archives.
 - i. As part of the appraisal process, Washington State Digital Archives will also discuss with departments the possibility of transferring copies of the imaged records as well.
 - ii. Having the imaged copies not only facilitates easier access to the records, it also helps preserve the original paper records which will no longer need to be handled as often by the State Archives.
 - d. Additional advice regarding the management of public records is available from:
Washington State Archives:
www.sos.wa.gov/archives
recordsmanagement@sos.wa.gov

TOWN OF WOODWAY

SCAN & TOSS CHECKLIST/APPROVAL FORM

Department: _____ Date: _____

Contact Name: _____ Phone No. _____

Disposition Authority Number (DAN)	Records Series Title	Date Range of Records Requested for Destruction	Scanning Type

1. ARE THEY ELIGIBLE?

- The records listed above are “NON-ARCHIVAL” and eligible for early destruction after scanning.

2. ARE THE RECORDS BEING SCANNED TO ENSURE A COMPLETE AND ACCURATE COPY?

- Quality control procedures will be followed to ensure capture of complete and accurate copies.
- Imaging will comply with the scanning requirements in the table below

Type of Document	Density	File Type
1. Black & White (Bitonal) up to size 8.5” x 11”	300 DPI	Lossless PDF or PDF/A
2. Black & White (Bitonal) & Grayscale (maps, engineering drawings, and other documents containing fine detail or poor contrast) larger than size 8.5” x 11”	600 DPI	TIFF Group 4
3. Color – all sizes	600 DPI	TIFF Group 5

3. ARE IMAGES ACCESSIBLE AND PROTECTED FOR THE ENTIRE REQUIRED RETENTION PERIOD?

- Appropriate steps will be taken to protect images from deletion, alteration, or other damage/loss.
- Appropriate planning and strategies will be implemented for migration and technology changes.
- Appropriate index methodology to search documents.

APPROVALS:

Department Head/Supervisor

Date

Clerk-Treasurer/Public Records Officer/Designee

Date