



Requirements for the Destruction of Non-Archival Paper Records after Imaging “Scanning and Tossing”

Purpose

This document outlines the minimum requirements that state and local government agencies in Washington State must meet in order to lawfully destroy paper-based source records after they have been converted to a digital format by imaging (scanning).

The requirements and guidelines in this document are drawn from state and national records-imaging standards to provide additional guidance on scanning procedures, design and maintenance for scanning systems, and quality control measures to ensure complete and accurate copies of paper-based source documents.

These requirements and guidelines promote best practices for ensuring access to, and retrieval of, digital images throughout their legally-required minimum retention period(s), and assist state and local government agencies with the implementation of:

- Washington State records retention schedules;
- Chapter [40.14 RCW](#) *Preservation and Destruction of Public Records*;
- Chapter [434-662 WAC](#) *Preservation of Electronic Records*; and,
- Chapter [434-663 WAC](#) *Imaging Systems, Standards for Accuracy and Durability*.

For standards and guidelines on microfilm, refer to the publication, *Washington State Standards for the Production and Use of Microfilm* at <http://www.sos.wa.gov/archives/pdf/Microfilm%20Standards.pdf>.

PLEASE NOTE: State government agency staff MUST consult with the agency’s Records Officer on all matters relating to the maintenance, retention, transfer and/or destruction of public records in accordance with [RCW 40.14.040](#).

Authorization

The State Records Committee and the Local Records Committee have approved destruction authorities for **non-archival** paper-based source records that have been imaged – **and verified to be complete and accurate** – in accordance with these requirements. The destruction authority for non-archival *state* government agency source records is provided by DAN GS 11012. The destruction authority for non-archival *local* government agency source records is provided by DAN GS50-09-14.

Retention Schedule	Disposition Authority Number (DAN)	To Whom Does This DAN Apply?
<i>State Government General Records Retention Schedule (SGRRS)</i> http://www.sos.wa.gov/archives/RecordsManagement/RecordsRetentionSchedulesforStateGovernmentAgencies.aspx	GS 11012	All state government agencies
<i>Local Government Common Records Retention Schedule (CORE)</i> http://www.sos.wa.gov/archives/RecordsManagement/UsingtheLocalGovernmentCommonRecordsRetentionScheduleCORE.aspx	GS50-09-14	All local government agencies

Effective Date

Approved by Jerry Handfield, State Archivist, on May 15, 2012, in accordance with [RCW 40.14.020\(6\)\(a\)](#).



Minimum Requirements to “Scan and Toss” CHECKLIST

1. ARE THE RECORDS ELIGIBLE?

- Only “NON-ARCHIVAL” records are eligible for early destruction after scanning. (See page 3.)

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

- Quality control procedures implemented to ensure capture of complete and accurate copies. (See page 3.)
- Short-term records (6 years or fewer) imaged with an acceptable file format such as PDF, PDF/A, JPEG or TIFF. (See page 4.)
- Long-term records (longer than 6 years) imaged with an acceptable lossless file format such as TIFF or PNG. (See page 4.)
- Black & White (bitonal) documents containing fonts no smaller than 6-point and grayscale records scanned with a resolution of at least 200 dpi. (See page 4.)
- Black & White (bitonal) maps, engineering drawings, and other bitonal documents containing fonts smaller than 6-point, fine detail, or poor contrast, scanned with a resolution of at least 300 dpi. (See page 4.)
- Color records scanned with a resolution of at least 150 dpi. (300 dpi recommended. See page 4.)

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

- Appropriate steps taken to protect images from deletion, alteration, or other damage/loss. (See page 5.)
- Appropriate planning and strategies implemented for migration and technology changes. (See page 5.)

Please note: State government agency staff MUST consult with the agency’s Records Officer on all matters relating to the maintenance, retention, transfer and/or destruction of public records in accordance with [RCW 40.14.040](#).



KEY COMPONENTS for “Scanning and Tossing”

What Records Are Eligible For “Scanning and Tossing”?

Eligible records **MUST** be “NON-ARCHIVAL” and covered by a current, approved records retention schedule.

- State government agencies are to use only records retention schedules approved for their use by the State Records Committee in accordance with RCW 40.14.050.
- Local government agencies are to use only records retention schedules approved for their use by the Local Records Committee in accordance with RCW 40.14.070.
- Current approved records retention schedules for both state and local government agencies are available on Washington State Archives’ website at www.sos.wa.gov/archives.

“ARCHIVAL” records **MUST not be destroyed**.

- An agency may scan “ARCHIVAL” records in accordance with these requirements. However, after imaging is completed and verified, an agency is to arrange for appraisal and/or transfer of both the paper and the images to Washington State Archives for preservation.

Note: For county clerks, there is an exemption regarding the destruction and reproduction of court records. For details, see RCW 36.23.065 at <http://apps.leg.wa.gov/RCW/default.aspx?cite=36.23.065>.

How Do The Records Need To Be Scanned?

Records **MUST** be scanned and verified in a systematic and consistent fashion that ensures a complete and accurate copy of the source record. Records that are not completely and accurately captured must not be destroyed.

Agencies should develop written quality control procedures and work instructions to ensure a consistent capture of complete and accurate copies of original records. Train all staff with scanning responsibilities to ensure that they adhere to these requirements and procedures. *Agencies are not required to use any specific systems, applications, or scanners.*

Examples of specific quality control procedures are:

- Enhancements or other manipulations of the scanned images (such as de-skew, de-speckle, etc.) in order to improve the quality of the resulting image.
- Routine use of scanning targets to verify configuration settings.
- Visual comparisons and inspections of each imaged record and source document, or of selected images and source documents.
- Regular calibration and testing of systems and scanners.
- Periodic checks that the indexing/metadata is accurate and appropriate.
- In instances where a complete and accurate image cannot be obtained and verified, the source document must be retained for the entire minimum retention period (and the image should be labeled or tagged as “best scan possible”).
- In instances where the content of the source document is not completely legible (faded receipt, coffee stain covering information, etc.), the source document must be retained for the entire minimum retention period. (If the image is *more* legible than the source document, retention of the source document is not necessary.)

If vendors are doing the imaging:

- Vendors must also comply with the requirements as specified in this document.



What Formats Should Be Used?

There are some differences between the most commonly used formats. Formats are subject to changes and updates, and newer versions may not be always backwards compatible or be suitable for long-term preservation.

For shorter-term retention (fewer than 6 years total), either a lossless or lossy image format may be used. Acceptable file formats include:

- TIFF, PNG
- PDF, PDF/A
- JPEG, JPEG 2000

Long-term records (more than 6 years total retention) require lossless image formats in order to ensure preservation. The current recommended formats are:

- TIFF (Group 4 for Black & White (bitonal) images; Group 5 for grayscale and color images).
- PNG
- For “ARCHIVAL” images that are to be transferred to Washington State Digital Archives, the recommended format is TIFF (Group 4 or Group 5 for scanned images).
- If an agency chooses to use data compression to save space, a lossless compression method must be used for long-term records.

Image Density (Resolution) Table (Chapter 434-663 WAC)

OUTPUT	DENSITY
Black & White (Bitonal) (fonts no smaller than 6-point)	Minimum of 200 DPI Recommended 300 DPI
Black & White (Bitonal) (maps, engineering drawings, and other documents containing fonts smaller than 6-point, fine detail, or poor contrast)	Minimum of 300 DPI Recommended 300 DPI
Grayscale 8-bit	Minimum of 200 DPI Recommended 300 DPI
Color 24-bit RGB	Minimum of 150 DPI Recommended 300 DPI

What About Organizing, Indexing, And Metadata?

- 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 images.
- An agency should develop consistent naming conventions and file/directory structures to facilitate organization, identification, access and retrieval for users.
- Agencies should capture appropriate business and recordkeeping metadata (such as type of record, Disposition Authority Number (DAN), destruction date, etc.)



How Do I Manage, Store, And Retain Images?

Images MUST be stored, maintained and accessible for the entire length of the required retention period.

An agency needs to factor in not only the retention period (e.g., six 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.

Agencies MUST retain legal custody of the imaged records.

If agencies choose to use outside providers (including other government agencies and “cloud” storage, but excluding Washington State Archives) to store/host the imaged records:

- Contracts/agreements must require that legal custody of the records remains with the originating agency and that all imaged records (including associated metadata) be returned to the agency, in a format accessible by the agency, at the end of the contract/agreement.
- Agencies 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.

Imaged records MUST be protected against alteration and/or deletion, damage, or loss throughout the entire retention period.

- Specific protective measures may include, but are not limited to:
- Establishment of security protocols, and approved administrators and users.
- Employment of system checks and error-checking utilities.
- Implementation of back-ups and disaster preparedness measures.
- Storage of a regular backup at least 50 miles off-site to enable recovery and access to the imaged records in the event of a wide-spread disaster or emergency.

Imaged records MUST remain accessible for the minimum retention period. To address technology changes, agencies are to either:

- Maintain the ability to retrieve and view imaged records in systems and file formats that the agency is currently using; or,
- Migrate or export the record images (including associated metadata) to succeeding systems and file formats throughout their required retention periods.

It is recommended that an agency use a records management application which has been certified as DoD 5015.2 compliant for the ongoing storage and management of the imaged records.

- A link to a list of DOD 5015.2-certified products is available at <http://jitc.fhu.disa.mil/cgi/rma/>.

Note: For Non-Archival records with a required retention of “Permanent” or “Life of the Agency”, it is strongly recommended that the agency create state standard-compliant 35mm security microfilm from the digital scans 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.



When Can The Images Be Destroyed?

Imaged records are to be destroyed only after the minimum required retention period as specified by the approved records retention schedule currently in effect.

Reminder: If images are not verified for completeness and accuracy, the source documents must not be destroyed. Instead, the source documents must be retained for their entire minimum retention period.

Records **MUST NOT** be destroyed when required for:

- a) Existing public records requests in accordance with chapter 42.56 RCW; or,
- b) Ongoing or reasonably anticipated litigation; or,
- c) Other legal requirements, federal statutes, grant agreements, etc.; or,
- d) Archival transfer.

If changes to the records retention schedules have occurred between the digitizing of the record and their planned destruction, and those changes have altered the minimum retention period (or the ARCHIVAL designation) of the imaged records, agencies must follow the current approved records retention schedule.

Agencies 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 agency's procedures for the lawful destruction of public records in other formats.

Agencies should document the destruction of both paper and scanned records.

- Documenting the destruction of public records, *including scanned images*, provides agencies with evidence to prove that they retained their records for at least the minimum retention periods.
- Agencies will want to document that the paper was converted and destroyed lawfully under the appropriate disposition authority, and that the images are also destroyed lawfully once the retention requirements have been met.

References

State

[Washington State Archives](#)

[Washington State Laws and Agency Rules](#)

[Washington State Standards for the Production and Use of Microfilm](#)

Federal

[Department of Defense 5015.2 Standards](#)

[JITC Records Management DOD5015.2 Certification](#)