

	<i>Administrative Regulation</i>	
	DIGITAL IMAGING AS OFFICAL COPY	Policy #: 15.03
		Effective: 10/16/2017
		Revised: 04/16/2024
	Owner: CMO	

Note: Terms that are ***bolded and italicized*** the first time they appear in this regulation are defined below. After the first occurrence, defined terms appear in *italics only*.

PURPOSE:

This regulation establishes when scanned or digitally created records may be designated as the ***official copy*** for retention and inspection purposes. Employees must follow procedures to ensure digital records comply with Oregon ***Public Records*** and Archiving laws.

SCOPE:

This regulation applies to all *public records* created, received, or stored electronically by the City.

POLICY:

Records with a retention schedule of ten (10) years or less are considered the *official copy* once scanned and verified in the City’s ***digital imaging system*** in accordance with this regulation.

Public records with a retention period greater than ten (10) years and less than ninety-nine (99) years may be designated as *official copy* if:

- The record is scanned and verified by the City’s *digital imaging system*; and
- A documented ***migration plan*** exists describing how the record will be preserved, transferred, and maintained overtime without information loss of information or integrity.

The City must migrate digital records stored on CDs, DVDs, magnetic tapes, or similar media every ten (10) years, or no later than one (1) year prior to the end of vend-supported playback, whichever occurs first.

PROCEDURE:

1. Migration Plan Requirements

A. Documentation Standards

- a. Employees must document and file scanned records with a retention schedule of more than 10 years and less than 99 years in accordance with City Recorder instructions. Required documentation includes:
 - (1) The date the document was scanned into the *digital imaging system*.
 - (2) The retention period of the original document.
 - (3) The date the retention schedule ends.
 - (4) The header label used in the imaging system.

B. Digital Storage and Backup Controls

- a. The City maintains all digital data in an online *electronic* format and performs regular *electronic* backups.
 - (1) City servers use fault-tolerant storage systems to prevent single points of failure.
 - (2) Backup methods include both hard disks and magnetic tape libraries with multiple drives.
 - (3) Multiple copies of backup data are stored off-site for up to one year.
 - (4) The City uses an enterprise-wide backup system, and backup media is refreshed periodically.

C. Security and Image Integrity

- a. *Public record* images are stored in secure *electronic* repositories.
- b. Repositories are backed up to both magnetic tape and secondary drives.
- c. Scanning practices meet or exceed the 300-dpi resolution standard required by OAR.
- d. Security protocols, including SQL Server protections and off-site redundant backups, ensure that images and metadata cannot be altered or destroyed.

D. Technology Obsolescence and Migration

- a. When server technology becomes obsolete,
- b. IT staff will migrate the entire repository to replacement systems.

E. Annual Media Inspection

- a. In accordance with OAR 166-017-0035(5), IT staff must inspect digital imaging storage media annually. If media must be replaced, the images must be transferred intact and unchanged to the new medium.

2. Permanent Records

- a. Permanent records or records with a retention period over 99 years may be scanned but must also be retained in paper or microfilm format.

DEFINITIONS:

Digital Imaging System:

Any imaging system implemented by the Information Technology Department. The system must meet criteria outlined in OAR 166-017-0025.

Electronic Record:

A record created, maintained, or scanned into an electronic format.

Migration Plan:

A plan describing how data will be transferred from the City’s digital imaging systems to new platforms without information loss..

Official Copy:

As defined by OAR 166-005-0010(7) is the version of a public record designated as the legal record of a transaction or event, subject to applicable laws and retention schedules.

Public Record:

As defined in ORS 192.005 is any information that:

- Is prepared, owned, used, or retained by the City.
- Relates to City activities, transaction, or functions; and
- Is needed for fiscal, legal, administrative, or historical purposes.

Additional guidance:

- Public records may exist in any format, including paper or electronic (e.g., email).
- Extra copies retained only for reference are not considered public records.
- Voicemail messages are not public records.
- Text and instant messages may qualify as public records.

RESOURCES:

Online Resources:

- [Springfield Municipal Code Section 2.305, Custody of Records](#)
- [OAR 166-017-0025, Electronic Records Management Systems](#)
- [OAR 166-017-0035\(5\), Digitization Standards](#)
- [ORS 192.005\(5\), Public Record](#)
- [ORS 192.050, Copying records; evidentiary effect](#)
- [ORS 192.314, Right to inspect public records; notice to public body attorney](#)