**University of Washington**

**Department of Comparative Medicine, School of Medicine**

**Records Scanning Policy**

**Purpose**

**Retention of Records**

The purpose of this document is to establish a consistent process that enables the Department of Comparative Medicine (DCM) to replace paper records with scanned, electronic records while ensuring adherence to retention requirements. This DCM process is based upon UW guidance and on Chapter 434-663 of the Washington Administrative Code (WAC).

All records have a specific amount of time they must be maintained, called a “retention period”, that is based on the content of a record. Retention periods are found on the Department of Comparative Medicine Records Retention Schedule. Retention periods included in the Records Retention Schedule apply to all records regardless of their physical form or characteristics.

Once DCM paper records are scanned according to the technical requirements outlined in this document, the paper records can be destroyed. It is, however, important to note that the retention period which would have been applied to the paper record must instead be applied to the scanned record. The retention period also applies to records originating and remaining in electronic form.

**Technical Scanning Instructions**

**Formats and Scanning Densities**

Black and white, gray, and color paper records can be scanned. Any kind of record can be scanned including color text documents, photographs, maps, plans, diagrams, and drawings.

* Scanners must be set at a minimum of 300 dpi (dots per inch): and
* Scanned records must be saved as searchable PDF files.

**Quality Control**

Scanned document images must be inspected visually to ensure they are complete (the entire document has been captured), clear and easily read. It is required that:

* At least every 10th page of each document is reviewed to ensure the scanning quality is consistent and the images are usable. If and when visual inspection raises doubts, the scanned records should be compared to the original paper document to ensure accuracy; and
* The number of original paper pages in a document is compared to the number of pages in the scanned record to ensure that every page of the document was scanned.

**Image Enhancement**

Problems with a scanned image can make it difficult to read and less than usable. If the scanned document is to replace the original paper record the following common problems must be corrected as noted.

* Speckles or spots on the scanned image that obscure its contents:
  + Clean the glass on the scanner and rescan the paper.
* Skewed images that are not properly aligned:
  + Rescan the paper so that the image appears straight.
* All portrait orientation pages should be rotated to read from left to right; all landscape orientation pages should be rotated with the top of the page facing the left.
* Sometimes only part of the document is captured by the scanner:
  + Rescan the paper so that it is properly aligned and the entire page is included in the scanned image.
* If the scanned record is of poor quality and is not clearly readable:
  + Reset the dpi (dots per inch) setting on the scanner to a setting higher than 300 dpi and scan again. Keep increasing the dpi until the record is as readable as possible.

**Poor Quality Images**

Sometimes the condition of the original paper record precludes a good quality scanned image from being produced. In these cases DCM will document the problem to avoid future confusion over the poor quality of the scanned image, and retain the paper copy.

* The person scanning will confer with the DCM authorized Approver to make the determination of whether a scan is of usable quality.
* If the best scan is deemed unusable, tag the image with “best scan possible – paper retained”, using Acrobat Pro “Additional Metadata” in the Document Properties description tab.
* Keep the paper copy of the record in a location determined by the authorized Approver.
* The scanned copy will still be electronically filed.

**Managing Scanned Records**

**File Naming Convention**

Scanned records will be named following a convention appropriate to the type of record. These conventions will be documented in standard operating procedures. The naming convention will allow scanned records to be identified for destruction at the end of their retention period and must be determined at the beginning of the scanning process.

**Organizing and Filing Scanned Records**

All scanned records will be saved on the DCM shared drive at: Shared (Q:)\Records Management (or its successor, such as SharePoint). This location will have at least nightly backup to a UW-authorized data store. Scanned records should not be saved to thumb drives or to the hard drive (e.g. C-drive) on a personal computer.

Documents will be stored in a folder structure that enables records to be readily accessed and managed for destruction at the end of their retention period. For example, the folder structure for Animal Billing documents on Shared (Q:)\Records Management is as follows:

* Animal Billing
  + Billing Documents
    - *Month, Year*
      * Invoices *(arranged by budget number)*
      * Per Diem Sheets *(arranged by budget number)*
      * Service Charges *(arranged by budget number)*
* Reports
* *Month, Year*
* Activity
* Census
* Revenue

DCM may move to a database or document/content management system for saving scanned records. If so, we will configure the database or system so that records with the same retention are mapped, and include identifying retention information in the metadata of the record to facilitate searches. Metadata tags may include: Original Document Date, Document Type, Cut-Off /Trigger Date, Retention Period, Keywords, Index ID information, Best Scan Possible, etc.

**Modifying Scanned Records**

It is important to ensure that the original content of a scanned record is not altered or modified once it has been finalized. Scanned records will be “read only” PDF format, to ensure that there is no improper alteration or modification. However, many times it is useful to add a note on a PDF using a text box or other Adobe annotation tool. This is not considered a modification of the scanned record and is an acceptable and practical way to make notes on an electronic record.

**Destruction of Scanned Records**

All scanned documents must be kept through the duration of their retention period. The deletion approval process at DCM includes:

* Approver: Typically the unit head or appointed delegate. Responsible for authorizing the deletion of records at the end of the retention period.
* Authorized records monitor: Responsible for monitoring records retention and identifying records due for deletion and, upon approval, deleting the records.
* Only authorized individuals (positions) may delete files. Ability to delete files from the database or networked storage location will be restricted to authorized users only.
* NOTE: All records pertaining to ongoing or pending audits, lawsuits (or even reasonably anticipated lawsuits), or public disclosure proceedings must not be destroyed, damaged or altered until the issue is resolved. The Approver is responsible for monitoring which if any records are subject to such restrictions. Once the issue is resolved, the Approver must be informed that records may be destroyed before giving approval for records destruction.

At the end of each calendar year, individuals authorized to delete files will review the titles of scanned files to identify all files that have reached the end of their retention period. They will send a list of file(s) to DCM’s Approver for destruction approval. Once the Approver returns the email with their approval, the designated individual will delete the file(s) and record the destroyed file(s) on the Records Destruction Log. The log will include: document type, original document date or trigger date, date deleted, deleted by, and deletion authorized by.

**Migration and Preservation Strategies**

DCM currently does not maintain any archival records or records with a retention period of more than 6 years that would require a migration and preservation strategy before the original paper documents can be destroyed. If this changes, a migration and preservation strategy will be added to this policy.

**Disaster Preparedness and Backups**

Scanned records must be backed up to ensure that, regardless of any damage they may sustain for any reason, they remain accessible and readable for their full retention period.

* DCM shared drive at: Shared (Q:)\Records Management (or its successor, such as SharePoint) will have at least nightly backup to a UW-authorized data store. These backups will not be retained longer than is necessary to ensure restoration after a disaster or crash and in no case longer than the retention period of the records they contain.
* If a specific software application is being used, back-ups must include architecture as well as content.

**Security Standards**

The DCM shared drive at: Shared (Q:)\Records Management where scanned records are stored is considered a secure folder and conforms to the UW minimum standards for security. Its successor, if any, also will conform to UW standards.

When an employee separates, their immediate manager is responsible for notifying all system owners and operators, or the designated system administrator handling the computer or communications accounts, to close all related accounts and remove all access capabilities related to the separated employee.

Office machines used to create scans or copies will be checked annually and any copies of records found, deleted.