ENVIRONMENTAL HEALTH & SAFETY

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DEPARTMENT POLICY AND PROCEDURES

Environmental Programs e-Records policy

EFFECTIVE DATE: 10/1/2018

Policy Scope:

This policy applies to the creation (scanning) storage and retention of all records stored in an electronic format performed by the Environmental Programs Office.

Policy Purpose: The purpose of this policy is to …

1. Explain what records are stored electronically and where those records are stored.
2. Document our records scanning policy
3. Demonstrate our adherence to UW records retention policies.

PROCEDURES

Managing Electronic Records

Organizing and Filing Electronic Records

Environmental Program electronic records are stored on ether the S-drive or in the two sectional e-mail accounts (chmwaste@uw.edu or hazmat@uw.edu)

Environmental Programs will utilize their sectional shared drive (S:\) for storing the department's electronic records for the required retention period. This location will have at least nightly backup to a UW-authorized data store. Electronic records should not be saved to thumb drives or to the hard drive (e.g. C:\ drive) on a personal computer. All electronic records 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. Directory structure for our electronic records saved on our shared drive is as follows:

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- 01 Environmental Policies
- 02 Environmental Regulations
- 03 Admin Planning
- 04 Office Structure
- 05 Training
- 06 Emergency Preparedness
- 07 SOPs
- 08 Forms
- 09 Education Outreach
- 10 Advisory Committees
- 11 Data Management
- 11 ESSB
- 11 ESSB inventory
- 11 Masterlist entry info
- 11 Waste Contracts
- 11 Waste Evaluation Records
- 11 Waste Operations
- 12 Air Quality
- 12 EPA Sector Workgroup
- 12 PCBs
- 12 Pollution Prevention
- 12 Waste Water
- 12 Water Quality
- 13 Construction Projects
- 13 Grant Reviews
- 13 Montlake Landfill
- 13 MyChem
- 13 Shipping Transport
- 13 Site Remediation
- 13 Spills Advice
- 13 Underground Storage Tanks
- 13 UWT Contamination
- 14 Webpage wireframes

Electronic records in the form of e-mails and attached documents are stored in one of the two sectional e-mail accounts. Waste pick up requests, designation questions and responses are saved in chronologically in a folder label by year in our chmwaste@uw.edu account. All hazardous material shipping questions, informational or assistance requests are saved chronologically in a folder labeled by year in our hazmat@uw.edu account.

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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:

- Every 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.
- 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.

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Poor Quality Images

Sometimes the condition of the original paper record precludes a good quality scanned image from being produced. In these cases, EP 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 EP 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 Adobe 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.

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 in PDF format. 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 Electronic Records

All electronic records must be kept through the duration of their retention period.
- Only authorized individuals as appointed by the Environmental Programs Assistant Director 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 will review the titles of folders containing scanned files to identify all records that have reached the end of their retention period. They will send a list of folders to the Assistant Director of Environmental Programs for destruction approval. Once the Approver returns the email with his/her approval, the designated individual will delete the folders and their contents and enter the destroyed folders on the Records Destruction Log. The log will include: folder name, document type, original document year, date deleted, deleted by, and deletion authorized by.

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Migration and Preservation Strategies

It is believed that the PDF format will be accessible for the foreseeable future. If this changes, a migration and preservation strategy will be added to this policy at that time.

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.

- Environmental Programs shared drive at: S:\ will have at least nightly backup to a UW-authorized data storage. 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 Environmental Programs Shared Drive, where scanned records are stored, is considered a secure folder and conforms to the UW minimum standards for security. Any changes to the format of the shared drive will require that the policy be reviewed and amended, if necessary.

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.

Directories used to temporarily store scans will be checked annually by the Authorized Records Monitor and compared to the scanned documents in the designated directory. Copies of records found will be deleted. Documents that do not exist in the designated directory will be added using the naming conventions outlined above.

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POLICY APPROVAL

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NAME/TITLE: Doug Gallucci, Assistant Director for Environmental Programs

DATE: 10/11/2018

SIGNATURE: *Barbara Benson*
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NAME/TITLE: Barbara Benson, Director of UW Records Management

DATE: 10/11/2018