Managing Records as Reliable Evidence for ICT/ e-Government and Freedom of Information

A Country Strategy for Managing Records as Reliable Evidence for ICT/ e- Government and Freedom of Information

International Records Management Trust

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**INTRODUCTION**

Records are fundamental to the success of ICT/ e-Government and FOI initiatives. ICT systems will fail if electronic records cannot be identified, retrieved and used, if they are stored improperly, or if they cannot be linked to related paper records. E-Government initiatives will fail and citizens’ trust in government services will be eroded if the Government is unable to find the records that underpin these services or citizens discover that the integrity, completeness and accuracy of the information in the records cannot be trusted. FOI implementation will fail if the records subject to FOI requests cannot be found or if only some of the records are found, leaving in doubt the status of the rest.

Records are valuable assets, and because they are assets they must be managed by a regulatory framework that is as robust and rigorous as those that have been established for other assets such as human and financial resources. If such a framework is to be in place, then officials at all levels must be aware of the role records play as assets, their importance in support of government operations and priorities such as ICT/ e-Government and FOI, and the implications if they are not managed properly. A policy must be in place, accountability must be assigned and an organisation must be delegated the authority to oversee records management across the organisation. Professional capacity and sufficient financial resources must be in place to support the framework.

The *White Paper on Managing Records as Reliable Evidence for ICT/ e-Government and Freedom of Information*, to which this strategy document is linked, proposes that EAC governments consider developing records management improvement strategies that recognise the status of records as assets and their role and importance in support of government decision-making, programme delivery and accountability. This document describes the components of such a strategy and how it would be developed, structured and used.

The purpose of the strategy is to guide development of the regulatory framework required to manage records as valuable assets. It is both a business case and a strategic plan. It is a business case in that it argues that records management is important and why attention to records management issues that are undermining government operations and trust is critical. It is a strategic plan in that it sets out the initiatives that should be undertaken over the short and medium terms to address immediate records management issues and, over the longer term, to develop a comprehensive regulatory framework for records management. It also establishes goals and performance measures to help guide the implementation effort and identifies human, financial and materiel resource requirements.

Authority for the strategy should be clearly defined and reside with only one agency. Similar to other resource management functions, such as human resource management and financial management, the authority for records management should not be divided among multiple organisations. Overlapping mandates and conflicting objectives and priorities can lead to confusion on the part of records-creating organisations. Assigning authority to a single organisation at an appropriately senior level is key to the success of records management improvement initiatives. In most countries around the world the authority for overseeing and supporting records management has been assigned to the national archives. This is consistent with the principles adopted by the International Council on Archives, which state that:

*… the archives should facilitate the establishment of policies, procedures, systems, standards and practices designed to assist records creators to create and retain records which are authentic, reliable and preservable; the archives should be involved in the entire records life cycle (conception, creation, maintenance) to ensure both the creation and retention of records that are authentic, reliable and preservable and the capture, preservation and continued accessibility of records identified as having archival value....*

National archives understand the attributes of records, why they are important in terms of government decision-making, programme delivery and accountability, and how their integrity can be managed through time. As a consequence, it is the norm that the lead organisation for developing and implementing a records management improvement strategy should be the national archives working in partnership with others, especially the government’s ICT organisation.

**TERMS OF REFERENCE FOR THE STRATEGY**

Typically, a strategy is based on terms of reference. The terms of reference can be as important as the strategy itself. They set out the issues and events that stimulated the need for a strategy and provide a rationale for why the strategy should be at a certain level and scope, who should be involved in its development, over what timeframe the development work should be undertaken, according to what objectives, to support what outcomes, at what cost. The process for developing the terms of reference will require close consultation with those who will need to be involved in the strategy development exercise. The successful achievement of this step alone will ensure that the right players are on board, that they endorse the exercise and why it needs to be undertaken, and that they support the methodology and the request for resources.

A strategy development initiative normally requires a steering committee to guide the strategy development exercise and review the results. This mechanism would also be reflected in the terms of reference. Bringing together the members of the steering committee and having them understand their purpose and role as reflected in the terms of reference is a significant step that will pay high dividends when the strategy is finally developed. Partnerships can be born out of the experience gained through working together on strategy development steering committees. For records management strategies a steering committee normally will comprise, as a minimum, the national archivist and the head of the government’s ICT organisation. It may also comprise selected senior managers of government programmes, legal services, audit, and security. The Chair of the Committee should be at the senior executive level of the organisation and should be someone with the authority to address issues such as records management across the organisation. Although the Chair could be an executive manager responsible for an organisation-wide function such as human resource management or financial management, it could also be a senior executive manager responsible for a large, high profile programme where the significance of records is recognised and the individual is prepared to champion records management across the organisation. Regardless, the individual must be prepared to recognise the role of the national archives as the authority for facilitating the management of records across the government.

Approval of the terms of reference is a confirmation that key stakeholders understand the issues, at least in general terms, and are prepared to support a closer examination and analysis of the issues, their implications, and the possible strategic direction that should be taken to address the issues. Again the process of developing the terms of reference can be as valuable as the strategy development process itself.

**DEVELOPMENT OF THE STRATEGY**

The most important steps in the strategy development process are ‘consultation’ and ‘information gathering’. Managers and staff who stand to be affected by a potential records management strategy need to be informed about the nature and objectives of the exercise. They also need to be consulted on a regular basis. Briefings to the senior steering committee are fundamental but so too are briefings to managers and staff to keep them abreast of developments and to address any concerns they may have.

There are at least two forms of information gathering. Documents of a variety of types, ranging from plans and annual reports to status reports and laws, can be consulted for information on the functions, organisation, goals and priorities of the government. This will provide the important contextual information upon which the issues pertaining to records management can be overlaid and understood in the context of their impact on programme delivery, decision-making accountability and legal obligations.

Interviews are also key sources of information. Interviews with key senior officials provide an opportunity to identify not only the symptoms of poor records management (including the impact on programme delivery, decision-making and accountability) but also the deeper underlying causes. They are invaluable in bringing together the information required to analyse the root causes of the records management issues affecting an organisation and to set the stage for the establishment of a strategy to address the causes.

All the information gathered through available documents and interviews should be brought together, analysed and recommendations made as to the strategic direction that should be taken to address the identified issues. The results should be documented in a report and presented to the steering committee for its review and, eventually, its approval. Given the importance of the issues and the recommendations, it is vital that the recommendations approved by the steering committee be brought to the members of the executive and the head of the organisation for their approval.

Once approved, consultation sessions should be held and communications material distributed to advise those who will be affected by the recommendations. Finally, detailed action plans should be prepared to guide implementation of the strategy over the short, medium and long terms.

**COMPONENTS OF A MODEL STRATEGY**

This section describes the components of a typical strategy for addressing the issues often associated with poor records management. Considerable emphasis is given to the need to address fundamentals such as awareness, policy, the assignment of accountability and capacity. Strategies for managing records are normally based on the recognition that records are assets and that strategic recommendations should focus on the basic management attributes that enable the effective management of these assets for national development.

The sub-sections that follow describe the individual components of a model strategy. They are intended to be adapted to the circumstances of individual countries and hopefully will help accelerate the development of strategies that are relevant and responsive to the needs of individual governments. They can also help inform the development of broader region-wide strategies. Their purpose is to set out the fundamental ingredients of a strategy and ensure that the strategy is comprehensive.

**Background**

This component explains the purpose of the strategy and the rationale behind its development. It highlights the importance of records management and explains how the success of ICT/ e-Government, FOI and other government development priorities are dependent upon good records management.

**Issues**

This component identifies the implications of poor records management and the need for government to adopt a strategic approach based on the concept of records as assets. It normally contains the results of analysis of the symptoms and causes of poor records management and an explanation of the impact this is having on government operations and priorities such as ICT/ e-Government and FOI. The results of a capacity assessment would also be included, based on an analysis of the current level of risk for various aspects of records management measured against specified levels of reduced risk resulting from enhanced records management. Sample statements describing the issues and the implications are described in the report, *Managing Records as Reliable Evidence for ICT/ e-Government and Freedom of Information: Regional Analysis Report*. A risk assessment tool for measuring risk and organisational capacity in records management is provided at Appendix A.

**Objectives**

This component describes the objectives of the government-wide strategy for enhancing records management to support ICT/ e-Government and FOI. The objectives are consistent with objectives for ICT/ e-Government and FOI initiatives. Generally the objectives of a strategy for records management improvement will be to analyse the situation in a given government and to offer recommendations designed to:

* reduce the risk to ICT/ e-Government and FOI initiatives as well as to government operations generally by improving the management of records in all physical forms
* establish a regulatory framework for the management of records as valuable assets of the government
* set out strategic short, medium and long term goals that will lead to the regulatory framework
* assess and recommend the assignment of responsibility for overseeing the implementation of the regulatory framework to an authority within the government.

**Outcomes**

This component describes the end state that the strategy is attempting to achieve. It is a visionary statement of what the situation would look like after the strategy has been implemented successfully. Such a statement would provide a point of reference to help guide the strategic initiatives. It could also be used as an awareness-setting tool to confirm the importance of records management in the minds of key stakeholders. One approach to developing a vision is to use the descriptions provided for the highest levels of the risk assessment tool described at Appendix A. Collectively, these descriptions form a comprehensive picture of the ideal end state (or vision) for records management.

**Principles**

This component describes the principles that should be reflected in the strategy and that should be applied to guide its implementation. A suggested set of principles is as follows:

* The strategy clearly recognises the fundamental role that records play in government business and accountability and the high levels of risk governments are experiencing as the result of inaction.
* The strategy reflects national interests, concerns and directions; while its scope may be limited to an individual country government, it can inform the development of strategies at the regional level, especially if the government is one of several in the region working on developing their own strategies.
* The strategy identifies short-term goals that are readily achievable as well as longer-term goals and priorities.
* The strategy is comprehensive in that it addresses all components of the regulatory framework required to manage records as assets.
* The strategy is based on partnerships established, as a minimum, between records and archives management and ICT; other disciplines such as audit, security, and legal services may also be involved.

**Strategic Initiatives**

This component describes the strategic initiatives that should be established to enhance records management capacity in direct support of the goals of ICT/ e-Government and FOI. Achieving these fundamental initiatives will set the stage for specific records management enhancement projects that will establish the regulatory framework for records management at the national level, result in records being managed as national assets, and ensure that ICT/ e-Government, FOI and other national priority initiatives will not fail because of poor record-keeping. The categories of initiatives that should be considered are described below. Examples of specific initiatives associated with each category are described in the report, *Managing Records as Reliable Evidence for ICT/ e-Government and Freedom of Information: Regional Analysis Report*.

***Awareness***

Initiatives should be established to enhance awareness about the dependence of government programmes on effective records management, the significant issues being faced by governments as a result of poor record-keeping, the implications for government programmes and the strategic way forward. The primary target audiences should be ICT managers and staff as well as senior officials responsible for government programmes and services.

***Policy***

Initiatives should be established to develop policy statements, approved at the highest level, that assign accountability for the management of records across all levels of government.

***Positioning***

Initiatives should be established to bring together the key players who will lead and steer the steps involved in developing the standards, practices, systems and tools required to manage records throughout their life cycle. The government’s national archives, working closely with the government’s ICT organisation, would be an important lead organisation. At the regional level, and in the interests of promoting a consistent approach to implementation of the strategy, it would be valuable to have a steering committee representing the five countries in the region.

***Human Capacity***

Initiatives should be established to ensure that people are trained and/ or recruited to support the management of records. This would involve the development of a relevant scheme of service, the identification of core competencies, and the development of recruitment and training strategies based on an analysis of the gap between existing competencies and the required competencies.

***Partnerships***

Initiatives should be established to build partnerships among key players such as the government’s national archives and its ICT organisation. No single organisation can undertake records management improvement on its own. Records managers and archivists contribute professional content expertise and, with programme managers, identify requirements, while ICT specialists provide technical solutions that respond to the requirements, with both learning from one another in the process.

***Standards, Practices, Procedures, Systems and Tools***

Concurrent with the initiatives described above, steps should be taken to address immediate and specific records management issues. This is important because goals related to issues such as policy and partnerships may seem abstract and theoretical. Securing support for such initiatives, as important as they may be, could be challenging when government managers and staff are seeking immediate and practical solutions to day-to-day records management problems. This is why specific initiatives should be established to develop the practical tools that will address these problems and, over time, facilitate the management of records at all stages of their life cycle including creation, organisation, use, retention, preservation and disposition. For example:

* guidelines for documenting decisions and actions
* procedures for managing email messages and other electronic office documents
* standards for classifying records and establishing retention and disposal schedules
* functional requirements for integrating recordkeeping in ICT systems
* guidelines and specifications for establishing trusted digital repositories
* standards and guidelines for establishing the legal status of electronic scanned records and how paper and electronic records should be managed as a result of digitisation initiatives.

Other examples of such initiatives are described in the report, *Managing Records as Reliable Evidence for ICT/ e-Government and Freedom of Information: Regional Analysis Report*.

These initiatives should be based on a comprehensive plan designed to ensure that the products of the initiatives form a comprehensive whole rather than a scattered set of disjointed projects where the direct benefits for government programmes and initiatives such as ICT/ e-Government and FOI may be difficult to identify. Pursuing the development of immediate solutions to address critical real time issues is fine, but care needs to be taken to not lose sight of the ultimate goal of a comprehensive regulatory framework, especially if the solutions are to be sustainable through time. If initiatives to develop the regulatory framework are ignored, then at best the projects addressing immediate issues would be seen as unsustainable Band-Aid solutions; at worse, they could lead to confusion and undermine efforts in the future to establish more substantial projects directed to building the comprehensive regulatory framework.

**MEASURING THE STRATEGY**

Progress in implementing the strategy should be assessed on a regular basis. This should occur at two levels. The first is at the level of the individual initiatives and the second is at the level of the strategy itself. Indicators and targets need to be established to measure the extent to which individual initiatives under the strategy are meeting their goals and objectives. Similarly, indicators and targets need to be established to ensure that key milestones of the strategy are being implemented. For instance key milestones might be assigning an authority, establishing a steering committee and developing a policy. A subsequent milestone might be achieving a certain number of initiatives that build a level of capacity and/ or developing a critical set of standards and practices. Still other milestones might touch on the rollout of records management improvement initiatives across various parts of the government. Each of these milestones should be supported by its own indicators and targets so that reviews and evaluations will provide meaningful and actionable results.

Records management improvement strategies are living documents. They must be reviewed and updated regularly as progress is made and as new or unexpected developments emerge. Budget constraints, organisational change, changing priorities, or changes in the timetables of ICT/ e-Government and FOI initiatives can make it necessary to adjust strategy.

Developing and implementing the strategy will require strong leadership, collaboration and co-ordination at both the regional and country levels. By working together, however, senior managers, policy makers, and records and technology specialists can respond to the challenges and opportunities discussed in this paper.

**APPENDIX A**

**RECORDS MANAGEMENT RISK ASSESSMENT**

**1 AWARENESS**

**□ 0 points**

A) There is very little awareness among those involved in ICT/ e-Government and FOI of the challenges in managing electronic records.

**□ 1 point**

B) Most of those involved in ICT/ e-Government and FOI have heard of the challenges of managing electronic records but this awareness has not led to action.

**□ 2 points**

C) Everyone involved with ICT/ e-Government and FOI is aware of and understands the challenges of managing electronic records and steps are being taken to act on this awareness.

**SCORE: \_\_\_\_\_\_**

**2 LEADERSHIP**

**□ 0 points**

A) No one involved in ICT/ e-Government and FOI has taken a leadership role in addressing the issues of managing electronic records.

**□ 1 point**

B) One or more individuals involved in ICT/ e-Government and FOI have assumed a leadership role by advocating action, but the degree of influence is relatively limited.

**□ 2 points**

C) One or more senior managers involved in ICT/ e-Government and FOI support positive measurable change in the way that electronic records are managed; a senior level manager is prepared to champion the advancement of effective records management across the government.

**SCORE: \_\_\_\_\_\_**

**3 POLICY**

**□ 0 points**

A) There is no policy on the management of electronic records, nor are there provisions in other policies that set out requirements for the effective management of electronic records.

**□ 1 point**

B) There is a policy on the effective management of electronic records or statements are included in related policies. However, they have little influence on the day-to-day practices of the organisation. An organisation has not been assigned responsibility for overseeing the implementation or assessment of the policy.

**□ 2 points**

C) Policy statements are in place for the management of electronic records, the policy requirements are implemented in day-to-day operations and performance measures are applied to gauge the ongoing effectiveness of the policy. A lead organisation, normally the national archives, has been assigned the authority to assess policy compliance.

**SCORE: \_\_\_\_\_\_**

**4 AUTHORITY**

**□ 0 points**

A) An authority for overseeing records management across the government has not been established; no organisation is responsible for facilitating the management of records, setting standards, reviewing compliance with policies and procedures, and generally ensuring that records are in place to document decisions and actions and support government operations and priorities such as ICT/ e-Government and FOI.

**□ 1 point**

B) An authority has been named, but the organisation is either not appropriate given the responsibility it has been assigned or it lacks the credibility and/ or capacity to exercise its authority; it’s powers, such as the right to audit MDAs, are limited.

**□ 2 points**

C) An appropriate authority has been named, normally the national archives, and the organisation is provided with the resources it requires to carry out its mandate; MDAs respect the authority and act on its requirements, direction and role; the authority has the role to audit records management in MDAs.

**SCORE: \_\_\_\_\_\_**

**5 MANAGEMENT**

**□ 0 points**

A) Accountability for the management of electronic records has not been assigned to any specific department or personnel. There are almost no management controls in place, and no resources have been allocated to support the effective management of electronic records. Staff expertise is almost non-existent.

**□ 1 point**

B) Accountability was assigned and records management requirements were considered during implementation planning for ICT/ e-Government and FOI. However, subsequent analysis has revealed that staff are not following records management procedures or that systems do not allow them do so. Some expertise is available but it is not sufficient to fill the current gap in compliance and capability. There is no organisation in place to facilitate the management of records across the government.

**□ 2 points**

C) Accountability has been assigned, and it is measured as a part of regular performance assessments of staff. Management and staff understand and follow the records management procedures. Sufficient resources and expertise have been allocated to deal with electronic records issues. A lead organisation (in most cases the national archives) has been assigned responsibility for providing support to MDAs on the management of their records.

**SCORE: \_\_\_\_\_\_**

**6 STANDARDS, PRACTICES, PROCEDURES, SYSTEMS AND TOOLS**

**□ 0 points**

A) Practices for managing records are *ad hoc* and developed by non-experts within individual MDAs; facilities for managing paper records are inadequate and storage devices for retaining electronic records are maintained in poor conditions. The ability to retrieve records, even over the short term, is challenging.

**□ 1 point**

B) Individual MDAs have developed standardised approaches to managing their records but these have been applied to paper records only. Standards, practices and procedures for managing electronic records have yet to be developed. Automated techniques for managing paper records are either non-existent or outdated. ICT systems have yet to reflect records management requirements in their design. Facilities for managing paper records are available but environmental controls are inadequate. Storage devices for maintaining electronic records are also available but they are also stored in conditions that are inadequate. The preservation of records over the medium and long terms is at high risk. No organisation is in place to ensure that standards and practices are in place or that systems reflect records management functionality. If an organisation is in place it lacks the capacity to develop the required standards, practices, procedures, systems and tools.

**□ 2 points**

C) Government-wide standards, practices, procedures and tools for managing records throughout their life cycle are in place and being applied within individual MDAs. ICT systems supporting government operations reflect records management requirements. Emails and other office documents are being managed properly through the use of electronic document and records management systems. High quality records storage facilities including trusted digital repositories are in place for the management of records for as long as they are required. An organisation (in most cases the national archives) is in place to facilitate the development of the required standards, practices, procedures, systems and tools.

**SCORE: \_\_\_\_\_\_**

**7 RECORDS MANAGEMENT READINESS**

**□ 0 points**

A) Records management requirements, such as records registration and retention scheduling, were not included during the planning for ICT, e-Government and FOI, and no assessment has been undertaken to determine the current records management readiness of ICT systems. The ICT team is not aware of records management issues.

**□ 1 point**

B) Records management requirements were considered during the implementation planning for ICT/ e-Government and FOI. The documents and information that should be captured as records have been identified. However, the requirements for electronic records management have not been integrated successfully into the ICT technology and workflows. The ICT team is aware of the records management gaps and is considering how to address them. However, there is no organisation in place to co-ordinate these efforts or to advise on the records management implications.

**□ 2 points**

C) Records management standards and requirements have been applied during the design and implementation of systems. A subsequent analysis has revealed that operational systems are compliant with these standards and requirements. The appropriate documents and information are being captured and managed as records. The ICT team is aware of current good practices in electronic records management practices and technologies. A lead organisation, normally the national archives, is in place with the responsibility to ensure that a whole-of-government approach is taken to the management of records. It has the capacity and role to co-ordinate government-wide strategies and solutions. It is consulted regularly for expert advice on all matters pertaining to the management of records, especially those in electronic form.

**SCORE: \_\_\_\_\_\_**

**8 DIGITISATION**

**□ 0 points**

A) Paper records are scanned without consideration being given to what happens to the paper records and without reference to international standards for digitisation. It is generally assumed that the scanned image, or the electronic version, is the official record copy. Paper records related to the transactions are discarded or ignored once the scanning has been completed. Controls for properly managing the scanned images throughout all stages their life cycle, (creation, organisation, use, retention, preservation and disposition) are not in place.

**□ 1 point**

B) There are processes and resources in place to manage the paper records related to ICT transactions. However, these are not yet integrated with the systems that manage the scanned records. A legal opinion has been acted upon that establishes in what form the ‘official’ record must be retained, but there are few controls in place to manage the scanned records throughout their life cycle. There is no organisation in place to provide advice or oversee the management of records generated through digitisation initiatives. MDAs are left on their own with respect to how records are managed.

**□ 2 points**

C) Scanned records and related paper records are managed throughout their life cycle according to government-wide standards, practices and procedures that take account of international standards. Facilities, including trusted digital repositories are in place to manage the integrity of paper and electronic scanned records for as long as they are required in accordance with approved retention and disposal schedules. The appropriate laws and regulations are in place to allow the scanned records to be used as legal record copies. A lead organization (in most cases the national archives) is in place with the responsibility to ensure that MDAs are provided with the advice and support they require for managing effectively records related to digitisation initiatives.

**SCORE: \_\_\_\_\_\_**

**9 ONGOING ACCESSIBILITY AND USABILITY OF ELECTRONIC RECORDS**

**□ 0 points**

A) It is generally assumed that ICT systems will, by default, keep electronic records in a form that is accessible and usable for as long as needed. There is little or no up-to-date documentation available about the design and architecture of the systems. Legacy data is inaccessible, and it is not certain whether, in the event of failure, that the systems can be fully restored using the existing backup tools and media.

**□ 1 point**

B) The ICT team is aware and concerned about losing data due to system migrations, lack of metadata, technology obsolescence or legacy data on outdated backup tapes. Documentation was prepared for the initial deployment of ICT systems, but there have been several major upgrades and integrations since then that have not been documented. The team is not sure about the techniques or standards needed to address the digital preservation issue.

**□ 2 points**

C) A digital preservation plan is in place to ensure that those electronic records that must be kept long-term or permanently are migrated to an open and platform-independent file format. These records are stored in trusted digital repositories (within the MDA for current records and within the national archives for electronic records with longer term value) that is covered by an up-to-date business continuity plan. Sufficient metadata exists to help locate and identify the records and to provide a history of their creation, access, use, disposition and preservation. The documentation and preservation plan ICT systems (including specifications for the transfer of archival electronic records to the national archives) are kept up to date with the evolution of the systems. A lead organisation (in most cases the national archives) is in place with the responsibility to develop standards, practices, and procedures and to ensure that MDAs are provided with the advice and support they require for managing the preservation and continued accessibility of electronic records for as long as the records are required.

**SCORE: \_\_\_\_\_\_**

**SCORING THE RISK ASSESSMENT**

**TOTAL SCORE: \_\_\_\_\_\_**

*[add your scores from questions 1-9]*

**0-7 points**

The organisation is at serious risk from the loss and misuse of electronic information. Immediate action is needed, starting from a senior management level, to initiate a full assessment of the records management capacity, to review staff expertise and readiness to tackle the problem, and to assign priority and financial resources to address the issues.

**8- 12 points**

Some gaps in systems functionality or organisational capabilities could put the organisation at risk of the improper use or loss of electronic information. A gap analysis is needed to identify those areas that could most benefit from improved capacity.

**13- 18 points**

The organisation is operating at a high-level of capacity for electronic records management. The resources and staff expertise are available to maintain this level of competence.