



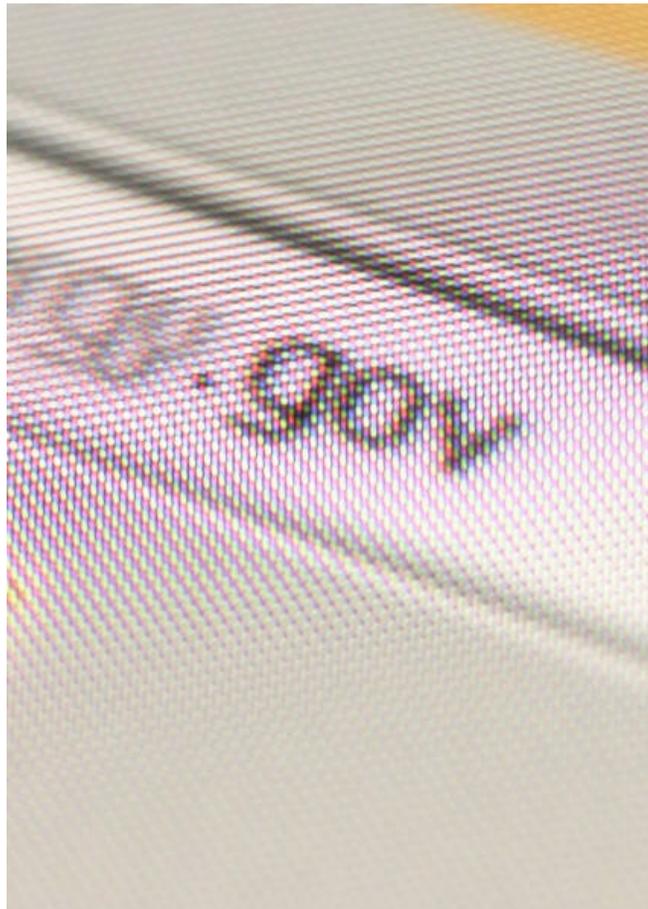
State of Wisconsin

Public Records Board



Guidance for Managing Web Records
For State Agencies and
Local Units of Government

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Guidance for Managing Web Records

Website operations are an integral part of an agency's program. Managing web records properly is essential to effective website operations, especially mitigation of the risks associated with using the web to carry out business. This guidance will assist agency officials in developing a governance strategy to retain web content and website administrative records with involvement from program staff, webmasters, information technology (IT) staff, and others who have a role in website management and administration.

Purpose: To provide Wisconsin state agencies and local units of government, including the University of Wisconsin (references to government agencies and/or agencies include all units of government at the state, county, and municipal levels unless otherwise specified) with guidelines to manage web records in alignment with the [Generally Accepted Recordkeeping Principles](#)® to aid in determining:

- What constitutes a web record (Integrity)
- Roles and responsibilities of agency members (Accountability)
- Risks, retention, and disposition of web records (Retention, Disposition)
- How to capture and maintain web records (Compliance, Integrity, Protection, Availability)

Scope: These guidelines are intended for Wisconsin state agencies and local units of government that:

- Maintain a public website, intranet, or extranet
- Use the internet to provide information, services and products to the public; and/or
- Conduct business with other organizations and/or individuals over the web.

Out of Scope: These guidelines do not cover content on social media websites like Facebook, Twitter, and YouTube. Guidelines for “Networking Sites” are available on the Public Records Board [website](#).

Regulatory Requirements and Ownership:

Per Wis. Stats.

[16.61\(4\)](#) “all public records made or received by, or in the custody of, a state agency shall be the property of the state, and these public records may not be disposed of without written approval from the Public Records Board.” Ownership of electronic records/data in web environments remains the property of the state agency or local unit of government that has responsibility per Administrative Rule, Chapter [ADM 12](#) for the records created, received, and transmitted via web-based technologies. See Wis. Stats.

[19.21](#) for ownership and retention requirements for local units of government.

What Constitutes a Web Record

The first step in managing web records is determining whether it meets the definition of an “official” record and shall therefore be governed by Records Retention Disposition Authorization (RDA) approved by the Public Records Board.

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A web record is any content that meets the definition of a record as described in Wis. Stats. [16.61 \(2\) \(b\)](#). *"Public records" means all books, papers, maps, photographs, films, recordings, optical disks, electronically formatted documents or other documentary materials, regardless of physical form or characteristics made, or received by any state agency or its officers or employees in connection with the transaction of public business, and documents of any insurer that is liquidated or in the process of liquidation under ch. [645](#).*

"Public records" does not include:

- 1. Records and correspondence of any member of the legislature.
1m. Any state document received by a state document depository library.*
- 2. Duplicate copies of materials the original copies of which are in the custody of the same state agency and which are maintained only for convenience or reference and for no other substantive purpose.*
- 3. Materials in the possession of a library or museum made or acquired solely for reference or exhibition purposes.*
- 4. Notices or invitations received by a state agency that were not solicited by the agency and that are not related to any official action taken, proposed or considered by the agency.*
- 5. Drafts, notes, preliminary computations and like materials prepared for the originator's personal use or prepared by the originator in the name of a person for whom the originator is working.*
- 6. Routing slips and envelopes"*

Records in electronic format must be managed according to specific standards and requirements for their entire lifecycle, which are detailed in [ADM 12](#). State or local government personnel, contractors, and partners supporting state or local web operations should understand that much of the content and documentation associated with agency and local government websites may meet the definition of a record and must be managed as such.

Managing web records is an agency's responsibility under public records law and is necessary to support all of the characteristics of a record's trustworthiness: reliability, authenticity, integrity, and usability. For recordkeeping purposes, this means not only managing the content pages, but also information that relates to the context in which the website was created and used. Website-related records can be broken into two main categories: (1) web content records representing information presented on a website, and (2) website administrative records, which provide evidence of the management, operations and structure of the website. See [Appendix C](#) for examples of Web Records Retention.

1. Web Content Records

Web content is comprised of information on the website itself. This can include: content pages that make up a website (ex: agency information, meeting agendas/minutes, reports, policy explanations) as well as records that can be created dynamically when a user interacts with the website.

For all web content, the determination must be made if official records will be managed solely on the website. The alternative is managing web content in agency recordkeeping

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systems using existing records management controls and considering the website information as convenience copies of those records. Managing official records solely on the website would require the implementation of separate records management controls.

Roles and Responsibilities for Managing Web Content

The ownership of web content belongs to the business or program area which manages that specific information in its routine business processes. The business area should work closely with information technology, legal, records management, and web administrative staff in defining a compliant records management solution that:

- is aligned with access, legal and regulatory requirements, and retention and disposition policies
- communicates those requirements to the department webmaster, team or contractor managing the website

Incorporating records management into the website management processes is the key to managing records content on the website.

2. Website Administrative Records

There are two categories of web administrative records that need to be actively managed in order to ensure the trustworthiness of an agency website – contextual and structural.

Contextual records are the administrative and technical records used to develop and maintain the website. These can include such things as policies and procedures for managing the website, site design and testing documentation, and reports that track web activity (metrics). Maintenance of these records provides a context for web operations, which attests to the reliability, authenticity, and integrity of an agency's website.

Structural records provide information related to the appearance or arrangement of the information. A site map for mission-critical websites indicating the arrangement of a site's content pages is helpful in providing a framework for content records and enables the integrity and usability of both current and preserved versions of an agency website.

Roles and Responsibilities for Managing Web Administrative Records

The ownership of web administrative records typically falls to the individuals or team responsible for the development and management of the agency's websites. Agencies that contract out their website development should work closely with the contractor to ensure that web administrative records can be captured and preserved according to records management guidelines.

Reducing Records Management Risks Related to Web Records

There are a number of records management-related risks with agency websites including a challenge to the trustworthiness of the records and unauthorized loss or destruction of records.

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The level of consequences will vary based on the degree of loss suffered by the agency or government constituents.

The key to reducing risk is having a process in place to approve and document changes to either specific web content or the overall website and consistently following the process.

Creation of a change control process may be necessary by the business area for web content that would facilitate retention changes due to an RDA amendment or when an RDA sunsets or expires. Similarly, those responsible for the administration of the website would use a change control process to facilitate production changes to the website. Any change control process should include steps for the following:

- requesting, reviewing, and approving a change
- roles and responsibilities for approving the change
- location for storing documentation for each unique change

Retention and Disposition of Web Records

A. Retention and Disposition of Web Content

The RDA under which a web content record is classified depends solely on the information content. See Appendix C, “*Web Records Retention*,” for examples of web content records and recommendations for scheduling and managing them. See your agency Records Officer with additional questions. The Records Officer will help you determine whether website content meets the definition of a record and provide guidance for management including:

Non-Records/Unofficial

If web content does not meet the definition of a record, take the necessary steps to dispose of/update the content when it no longer has value and to ensure the content is not kept longer than the official record.

Records/Official

If web content meets the definition of a record and is being managed solely on an agency’s website as the official record, determine whether an existing RDA or General Record Schedule (GRS) applies.

- ***Existing RDA or GRS***

If web content is included in an existing RDA or GRS, the content must be retained as specified in the approved RDA/GRS and must follow the records series disposition requirements.

- ***New RDA***

If web content is unique, meets the definition of a record, and is not currently covered by an approved RDA or GRS, contact your Records Officer to discuss creation of a new RDA. Consider including all web content for a specific website in one submission since it may provide the same business-related function. Once approved by the Public Records Board, the appropriate retention for the web content can be applied.

B. Retention and Disposition of Web Administrative Records

While there are several types of records created in the development and administration of a website, the majority of applicable RDAs are included in general records schedules. See [Appendix C](#), “*Web Records Retention*,” for examples of web administrative records and recommendations for scheduling and managing them. Please note your agency may not produce all of these record types (nor are you required to do so) and you may have other types that are not included in these examples. See your agency Records Officer if there are additional questions regarding your particular situation.

Agencies may also consider capturing the following where appropriate:

- Metadata that makes it easier to retrieve, use, or manage web records/content.
- Any portion of website administrative information that contains official records should be retained and disposed of per the appropriate RDAs. This may differ significantly from one website to another based on business function and criticality.
- How information is displayed on the website, revised and removed, in addition to having an awareness of what records are created when these actions take place.
- Transaction logs for transaction based website functions.
- Versioning of website content and records (may want to establish the difference between a minor version and a major version and what needs to be captured).
- Rollbacks where changes have been made affecting user views and functionality.

Capturing and Maintaining Website Records

Automated or manual processes are recommended to be in place for capturing web content to document compliance with state laws and regulations. Web content that contains an official record needs to be captured and remain accessible for its entire lifecycle, which can be accomplished via Content Management Systems (CMS) or similar tools. Again, it may be more efficient to manage official content through an agency’s internal recordkeeping system and post a convenience copy.

Periodic “snapshots” of agency websites can also preserve a website’s content, context and structure at a point in time and mitigate many of the risks mentioned previously. The frequency of the snapshot can be determined by performing a risk assessment using the Website Content Risk Assessment in [Appendix B](#). For state agency websites that are low level risk, the State Archives or University Archives can capture entire website snapshots on a regular basis. For state agency websites that are moderate level risk, the State Archives or University Archives can capture website snapshots for significant version changes based on prior coordination and agreement with the creating agency. For high level risk websites, the State Archives or University Archives can capture website snapshots for significant version changes as well as periodic snapshots on a more frequent basis based on prior coordination and agreement with the creating agency.

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Decommissioning Websites No Longer in Use

State agencies and local units of government should develop a content lifecycle strategy that includes what to do in cases where websites or their sub-sites have become stale or obsolete. When websites or sub-sites are ready to be decommissioned, consider the following before deleting the site and associated content of the site from the web server:

- There may be official records retained on the site that need to be managed per an RDA and where the content must be moved and appropriately retained through alternative storage for its entire lifecycle. The Agency Records Officer can provide assistance regarding application of records management policy to the site's content. See Section 3, Retention and Disposition.
- For public internet sites, consider requesting State Archives to capture a one-time snapshot prior to decommissioning the website.
- For sites that are not collected by the State Archives, the Agency Records Officer can work with IT to collect and archive the pages just prior to decommissioning of the website.

Summary

Each agency should develop a governance strategy to retain web content and website administrative records. The agency's strategy should address:

- Roles and responsibilities
- Capture and maintenance of web content
- Defining and mitigating identified risks
- Determining the proper retention and disposal of web records and content.

A governance team or steering committee to help define the agency's strategy should consist of representatives from information technology, records management, legal, web administrative staff, and program management teams.

Appendix A - Key Terms

Accessible	Information arranged, identified, indexed or maintained in a manner that permits the custodian of the public record to locate and retrieve the information in a readable format within a reasonable time.
Authentic	The retained electronic record correctly reflects the creator's input and can be substantiated.
Content	The basic data or information carried in a record.
Context	The relationship of the information to the business and technical environment in which it arises. "Context" can include, but is not limited to, such elements as: the origin of the record; date and time the record was created; identification of the record series to which the information belongs.
Disposition	The final state in a record's life cycle, involving destruction or transfer to either the Wisconsin Historical Society or University of Wisconsin Archives for permanent preservation.
ERM	Electronic Records Management. The application of records management principles to electronic records. The management of records using electronic systems to apply records management principles.
Extranet	An extranet is a computer network that allows controlled access from the outside, for specific business or educational purposes. In a business-to-business context, an extranet can be viewed as an extension of an organization's intranet that is extended to users outside the organization, usually partners, vendors and suppliers, in isolation from all other Internet users.
General Records Schedule	Provide agencies with uniform guidelines for the retention and disposition of records common to a business function across all agencies.
Information Governance	Ensures that risk and compliance issues are identified and addressed for as long as the information is required.
Intranet	A private network inside a company or organization, which is for internal use only and not accessible to the public.
Lifecycle	All phases of a record's existence: creation, active use, preservation and management through to disposition. "Disposition" includes permanent preservation as well as designation for destruction.
Local Unit of Government	Political subdivision of this state, or a special purpose district, or adjunct or corporation of such a political subdivision. Includes municipalities, towns, school districts, counties, and tax funded special districts.

Metadata	Structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.
RDA	Records Retention Disposition Authorization. A statement of records scheduling, which provides instructions and information as to the record content, format, length of the retention period, official record location and disposition.
Reliable	The electronic record produced accurately reflects the initial record each time the system is requested to produce that record.
Retention Period	The minimum length of time a business area must keep particular records. This is usually expressed in terms of years, months, days, and may be contingent upon an event date or specification date that triggers the “clock.” Most often, retention periods are triggered at: creation (CR), event (EVT), or fiscal year (FIS).
Record	Recorded information, regardless of medium or characteristics, made or received by an organization in pursuance of legal obligations or in the transaction of business.
Record Series	A group of related records filed/used together as a unit and evaluated as a unit for retention purposes.
Rollback	A rollback is the operation of restoring information to a previous state by canceling a specific transaction or transaction set. Rollbacks are either performed automatically by database systems or manually by users.
State Agencies	The term “state agency” is defined as: “any officer, commission, board, department or bureau of state government.” Wis. Stats. 16.61(2)(d).
Structure	The appearance or arrangement of the information in the record. “Structure” can include, but is not limited to, such elements as heading, body and form.
Transaction Log	System generated history of actions for a specific business purpose.
Versioning	Creating updated versions of content records.

Appendix B - Website Content Risk Assessment

LOW LEVEL RISK	MODERATE LEVEL RISK	HIGH LEVEL RISK
<p>Characteristics:</p> <ul style="list-style-type: none"> • Single Website • Copies of official publications and/or other content • Controlled postings • Content not controversial • Content never litigated and little or no legal risk • Content does not generate bad press • Constituents are satisfied w/ website • Little legislative interest 	<p>Characteristics:</p> <ul style="list-style-type: none"> • Number of complex websites • Many business areas posting to the websites • Overlapping and/or conflicting information • Both static and interactive websites • Unique original materials on websites • Legal counsel was not consulted • Some adverse and controversial reaction • Variety of management controls 	<p>Characteristics:</p> <ul style="list-style-type: none"> • More numerous and complex websites with sub sites • Contain bulletin boards, publications, unique original materials, and real time business • Different administrative arrangements • Public scrutiny; content is controversial • Substantial liability; frequently litigated • Frequent press coverage; public interest groups monitor sites • Active and vigilant legislative interest
<p>Records Management Analysis:</p> <ul style="list-style-type: none"> • Satisfactory; no further measures necessary; periodic review of website for changes. 	<p>Records Management Analysis:</p> <ul style="list-style-type: none"> • Additional measures should be taken to reconstruct prior versions 	<p>Records Management Analysis:</p> <ul style="list-style-type: none"> • Requires precise reconstruction of exact copies of past content
<p>Recommended Recordkeeping Response:</p> <ul style="list-style-type: none"> • Adequate documentation • Records already in record keeping system (paper and electronic) • Capture website snapshots on a periodic basis 	<p>Recommended Recordkeeping Response:</p> <ul style="list-style-type: none"> • Maintain directory listings of websites • Capture website snapshots for significant version changes based on prior coordination with the State Archives or University Archives • Apply retention schedule to website snapshots and changes. 	<p>Recommended Recordkeeping Response:</p> <ul style="list-style-type: none"> • Maintain regular sequential directory listings of website changes • Capture website snapshots for significant version changes as well as periodic snapshots on a more frequent basis based on prior coordination with the State Archives or University Archives • Apply retention schedule to website snapshots and changes. See Web Page Archiving Checklist.

Appendix C - Web Records Retention

Managing web records correctly is a shared responsibility extending to not only information technology, records management, legal, and web administrative staff, but all business areas that create the web content and maintain the structure of the website. This Appendix provides examples of web records and their applicability to existing records schedules and retention periods.

Web records can be defined as records generated, captured or received using web technologies. Records on an agency website generally fall into three categories:

- 1) web content records, including introductory or descriptive information about the agency, its activities or particular areas it manages, but also publications that it makes available on the web
- 2) inputs/outputs of transactions performed via the web e.g. data submitted via online forms
- 3) website administrative records which provide evidence of website operations and management

Records Description	Examples	Suggested Schedule	Responsible Party
Web content pages that reside on the site including introductory or descriptive information about the organization, its activities, programs, or particular areas it manages	Agency information; publications; reports; directories; fact sheets; newsletters; meeting agendas; meeting minutes	If a convenience copy, content should be deleted when superseded with a new copy. If considered the official record, content must be scheduled and managed according to the RDA related to the content	Business Area Content Managers
Web communication from the public including comments or routine requests for information or publications	Requests from the public for information and copies of replies involving no administrative actions, no policy decisions, and no special compilations	ADM00011, Transitory Correspondence	Business Area Content Managers
Records generated when a user interacts with an agency website	Inputs and outputs of business transactions	Content must be scheduled and managed according to the RDA related to the content	Business Area Content Managers
Website design records	Graphic design layouts for pages or embedded image maps; Minutes of meetings documenting the production of the site	IT000008 IT Project Plans and Charters	IT / Web Administrative Staff

Usability records, including test designs and usability testing reports.	Web usability tests and results	IT000009 IT Project Status Reports, Workflow and Test Plans	IT / Web Administrative Staff
Internet Log Files	Site posting logs indicating when pages were posted, updated, or removed from the site; System load and search result statistics	IT000023 Operational and Other Automated Logs	IT / Web Administrative Staff
Metrics – inventory of Web activity (Web Trends, etc.)	Reports of web usage retained for trend analysis and customer service performance or related usage tracking data	IT000028 Website Usage Reports	IT / Web Administrative Staff
Customized off-the-shelf (COTS) software configuration files.	Configuration files used to operate the site and establish its look and feel; Server environment configuration specifications	IT000012 IT Software/Hardware Operating Procedures and Infrastructure Documentation	IT /Web Administrative Staff
Site maps	A linked, graphic or text-based display showing the directory structure of a web site's hierarchy	ADM00011, Transitory Correspondence	IT /Web Administrative Staff
Web management and operations records	Records that: <ul style="list-style-type: none"> • provide detailed procedures for documenting how records are selected, created and approved for web posting, and how they will be revised or removed; • specify what records will be created and how they will be created for interactive sections of web sites; • document procedures used in the operation of the site; • specify the relationship of the webmaster and other staff involved in preparing and posting web documents 	IT00042 Web Management and Operations	IT /Web Administrative Staff
Templates, style sheets, and code that determines site architecture.	Source code used to construct and operate an automated information system. Change orders to source code need to be retained.	IT000011 Source Code and Test Data	IT /Web Administrative Staff

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