

Xtender Electronic Records and Imaging Regulation and Procedures

East Carolina University

January 2025



DIVISION OF ARCHIVES AND RECORDS — GOVERNMENT RECORDS SECTION

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1. Purpose

The records maintained in compliance with this regulation in ApplicationXtender (Xtender) are in the custody of Information Technology and Computing Services at East Carolina University and are maintained for the benefit of University use in delivering services and in documenting University operations. This electronic records regulation reflects guidelines established in accordance with the North Carolina Department of Natural and Cultural Resources publication *Guidelines for Managing Trustworthy Digital Public Records*.¹ Complying with this regulation will increase the reliability and accuracy of records stored in information technology systems and will ensure records remain accessible over time. Compliance with this regulation assists in preserving records in a trustworthy manner that may be used for admissibility and acceptance by the judicial system.

This regulation applies to all public records as defined by North Carolina G.S. § 132-1, *et seq.* This includes permanent and non-permanent records, including both confidential and non-confidential records. These classifications may warrant different treatments when processing the records. This regulation serves as basic documentation of the procedures followed by the University in imaging, indexing, auditing, backing up, and purging electronic records in accordance with the disposition schedule, and in handling the original paper records, if applicable.

This regulation also serves to protect those records digitized by the University's in-house Xtender imaging system, which reduces required storage space for original documents as the University transitions to a "more paperless" digital system and provides instant and simultaneous access to documents, as needed.

The form *Request for Disposal of Records Duplicated by Electronic Means* shall be completed and submitted to Joyner Library Records Management whenever a department wishes to dispose of a series of paper records that have been digitized. This form is used to request approval from the University records officer to dispose of **non-permanent** paper records that have been scanned, indexed in Xtender, or otherwise duplicated through digital imaging or other conversion to the Xtender environment. The *Request for Disposal of Records Duplicated by Electronic Means* form does not apply to records that have been microfilmed or photocopied. This form and more information about destroying records are available at [Joyner Library » Records Management - Destroying Records](#). This regulation supersedes any electronic records system regulation previously adopted. This regulation will be reevaluated at a minimum of every three years, or upon the implementation of a new information technology system

¹ [Guidelines for Managing Trustworthy Digital Public Records](#)

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and will be updated as required. A copy of this regulation will remain on file at the Department of Natural and Cultural Resources.

2. Responsible Parties

- Information Technology (IT) Department
- University Chief Records Officer
- Chief Information Officer
- Records Creators, which includes all staff using Xtender, other than for queries
- Department/Unit Managers and Supervisors

IT Department

Responsibilities include:

1. Installing and maintaining equipment and software
2. Configuring the system according to University needs, including creating and testing applications and indexes
3. Controlling permission rights to the system
4. Maintaining documentation of system hardware and software
5. Establishing audit trails that document actions taken on records stored by the information technology system
6. Providing backups for system recovery when necessary
7. Completing a disaster recovery test at least once every two years
8. Establishing and providing to records creators training on equipment and software, documenting such training, and providing remedial training as needed
9. Creating and updating detailed procedural manuals describing the imaging process and equipment and providing campus users with sufficient, current online resources

University Chief Records Officer

Responsibilities include:

1. Coordinating with the Government Records Section all requests for records assistance, training, and other offered consultative services
2. Coordinating interactions between campus business units and the Department of Natural and Cultural Resources to establish appropriate retention and disposition instructions for any records not included on the institution's Records and Disposition Schedule
3. Providing guidance on the appropriate storage of public records, so they are kept in secure but accessible places
4. In cooperation with the University Archivist and with the Department of Natural and Cultural Resources, establishing and maintaining a program for the selection and preservation of institutional records considered essential to the operation of government and to the protection of the rights and interests of citizens

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5. Participating in the design and implementation of campus electronic records initiatives covered by this regulation to ensure consideration of records management.
6. Oversees Xtender quality assurance, module approver security compliance, and Xtender standard operating procedure documents for Xtender applications.

Chief Information Officer

Responsibilities include:

1. Establishing Xtender as a document imaging solution for the University
2. Requiring institutional compliance with University information technology security policies
3. Encouraging staff participation
4. Requiring institutional compliance with University record retention policies

Records Creators (all staff using Xtender, other than for queries, are considered Records Creators)

Responsibilities include:

1. Completing online training conducted by IT staff or training by the Department of Natural and Cultural Resources
2. Creating passwords for computers that are consistent with the ECU Passphrase standards, industry best practices, and any other applicable policies and guidelines
3. Creating and managing electronic records in their purview in accordance with the policies and other guidance issued by the Department of Natural and Cultural Resources and complying with all IT security policies carrying out day-to-day processes associated with the University’s imaging program, including:
 - Designating records to be entered into the imaging system
 - Protecting confidential information or otherwise protected records and fields
 - Redacting sensitive information, as needed, prior to scanning documents to Xtender
 - Removing transitory records from the scanning queue
 - Indexing each record being scanned
 - Reviewing images and indexing for quality assurance
 - Storing the scanned images in designated application and document type
 - Conducting any necessary batch conversions or batch renaming of imaged records
 - Once approved, destroying or otherwise disposing of original records in accordance with guidance issued by the Department of Natural and Cultural Resources and this Electronic Records Imaging Regulation and Procedures document
4. Staff who have been approved to telecommute or use mobile computing devices must:
 - Comply with all information technology security policies, including the University and statewide acceptable use policies, as well as all statutes and policies governing public records

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Department/Unit Managers and Supervisors

Responsibilities include:

1. Ensuring training of record creators in all aspects of Records Management and Retention
2. Ensuring detailed departmental procedures describing the imaging process and equipment are complete and current
3. Periodically auditing imaged records for accuracy, readability, and reproduction capabilities before the original documents are destroyed
4. Reviewing security access to Xtender documents a minimum of twice annually, or at other intervals based on a documented assessment of the risks associated with the access to the specific document types
5. Reviewing records annually and purging records in accordance with the retention schedule
6. Retaining and maintaining records, regardless of format for the period of time required by University records retention schedules

3. Availability of System and Records for Outside Inspection

The University recognizes that various legal processes, including matters within the judicial system, may require the production of authentic records and related materials, including but not limited to pretrial discovery of the information technology system used to produce records and related materials.

University personnel will honor requests for inspection of the system and testing of data by opposing parties, the court, and government representatives, as required by law. Records shall be available for inspection and audit by a government representative for the period required by law and approved records retention schedules, regardless of the life expectancy of the media on which the records are stored. Records shall be preserved when required by law and when notice is provided related to litigation, government investigation, or for pending or imminent audit, or when a court order prohibits specified records from being destroyed or otherwise rendered unavailable.

To lay a proper foundation for the purposes of admitting the University's electronic records into evidence, the University shall maintain accurate documentation describing the procedural controls employed in producing records; procedures for input control including tests used to assure accuracy and reliability; and evidence of the records' chain of custody. In addition to this regulation, such documentation includes:

- Procedural manuals
- System documentation
- Training documentation
- Audit documentation
- Audit trails documenting access permission to records

The University will also comply with inspection and copy requests properly made pursuant to N.C. G.S. § 132, *et seq.* As required by law, the University shall produce records created and used in the course of

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business, maintaining established folder structure as applicable. The University should produce records in any format it is capable of producing if asked by the requesting party; however, the University is not required to create or compile a record that does not already exist. If it is necessary to separate confidential from non-confidential information in order to permit the inspection or copying of the public records, the University will bear the cost of such separation.

4. Maintenance of Trustworthy Electronic Records

Four characteristics are necessary for the maintenance of trustworthy electronic records:

- Produced by Methods that Ensure Accuracy
- Maintained in a Secure Environment
- Associated and Linked with Appropriate Metadata
- Stored on Media that are Regularly Assessed and Refreshed

Produced by Methods that Ensure Accuracy

Xtender is the University’s solution to create and manage electronic records. It conforms with the Department of Natural and Cultural Resources policies and the applicable IT security policies.

Electronic files are named in accordance with the standards incorporated with the Xtender software.

Files scanned in Xtender are named automatically by the software. The name of the file is not relevant, as files are indexed, and the indexes provide a method of file retrieval. Neither the users nor the software administrators are able to see the names of individual files. The application is named by Xtender. The naming scheme is as follows:

- B, ECU, or E:
 - B: Application delivered by Ellucian professional services at the time Banner was introduced.
 - ECU or E: Application created by ECU Xtender team.
- Department Name: Following the B, ECU, or E is the department name or an abbreviation for the department. For example, Academic Affairs is shortened to “AA”. Departments generally get to select how their name is displayed so they will recognize it in Xtender.

A screen shot below shows examples of how the naming scheme above is applied:

- ☐ E-PIRATE-CLUB-ID - PIRATE CLUB
- ☐ E-REG-ARCHIVE - REGISTRAR ARCHIVE
- ☐ E-SODM - SCHOOL OF DENTAL MEDICINE DOCUMENTS
- ☐ E-TEDI-BEAR-DOCS - TEDI BEAR DOCUMENTS

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Electronic files are saved in formats that comply with DNCR's *File Format Guidelines for Management and Long-Term Retention of Electronic Records*.² File formats used by the University are identified as standard by DNCR and are well-supported, backwards compatible, and have robust metadata support.

Maintained in a Secure Environment

Security of the system and the records it holds is maintained in the following ways:

- Access rights are managed by the IT department and are assigned by a supervising authority to prevent unauthorized viewing of documents.
- Xtender users must submit a Banner security request form to request access to data. The request must be approved by the appropriate approvers. Upon approval, Xtender security is used to grant access to the specific applications.
- Folders with confidential information are restricted, and access rights to confidential data are carefully managed. Before material is shared or exhibited, confidential information must be redacted.
- Physical access to computers, disks, and external hard drives is restricted.
- All system password and operating procedure manuals are kept in secure off-site storage.

Associated and Linked with Appropriate Metadata

Metadata is maintained alongside the record. There are two types of metadata associated with Xtender. The first is metadata associated with the document when it is originally imported in Xtender. The second is the index data associated with the document. When a document is imported by a user, Xtender captures the userid, Xtender application name, date, and time the document was imported. Another method to import documents in Xtender is via the Output Transformation Server (OTS). This process is automated and uses system level access to perform the import. As a result, there is no userid or time/date associated with this type of data import. In both cases, there is index metadata associated with the document.

Stored on Media that are Regularly Assessed and Refreshed

Data is converted to new usable file types as old ones become obsolete. The following steps are taken to ensure the continued accessibility of records kept in electronic formats:

- All data is stored on disk where it is retrievable at any time by Xtender users. The disk file system is monitored for any signs of corruption or inconsistencies.

²[File Format Guidelines for Management and Long-Term Retention of Electronic Records.](#)

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- The underlying storage system for Xtender data is shared among other enterprise applications. This regularly demonstrates the storage hardware and media are in good operating condition.
- Media is refreshed approximately every five years. The University documents when and how records are transferred from one storage medium to another. Once the new media has been sampled to assure the quality of the transfer, the original media may be destroyed according to the guidelines of 07 NCAC 04M .0510 in the North Carolina Administrative Code.
- Records are periodically migrated to new file types, particularly when a new information technology system requires that they be brought forward in order to render the file properly.
- Metadata is maintained during transfers and migrations.
- Storage media are maintained in a manner and in an environment that promotes bit-level preservation. Humidity does not exceed 50% and should not fall below 30%. Room temperature is set between 65° F to 75° F. The University adheres to the media manufacturer’s recommendations for specific environmental conditions in which the media should be stored.
- Whatever media is used to store data is clearly labeled with enough information that its contents can be determined (e.g., optical media should have a physical label; data stored on a server should be indexed or held in a document management system).

5. Components of Information Technology System

- Training Programs
- Audit Trails
- Audits

Training Programs

The IT department offers online Xtender training through Cornerstone, ECU’s training management system. The course covers basics such as logging in, navigating, best practices, and guidelines for using Xtender. Cornerstone maintains a record of those who complete the course. Training is also available one-on-one, as requested. This is either conducted face to face, Teams, or other similar screen sharing technology. Additional training resources are available on the Xtender website ([Xtender Document Imaging](#)). The website features “how to” guides for common tasks. New users to Xtender will complete Cornerstone training prior to gaining access to the production environment.

Audit Trails

The IT department will maintain documentation on who has read and/or write permission to Xtender applications maintained by the University. A log of activities on the system is maintained, which shows who accessed the system. The application records who creates a document and when it was created.

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The IT department also maintains a log of all documents or pages within a document that are deleted and who performed the action. Lastly, the IT department can generate a report showing access for any Xtender user.

Audits

Audits are designed to evaluate the process or system's accuracy, timeliness, adequacy of procedures, training provided, and the existence of audit trails. The University's Office of Internal Audit conducts IT audits to evaluate the quality of the controls and safeguards over the information technology resources and critical data of the University. Each fiscal year an annual audit plan shall be developed and submitted to the Chancellor and Board of Trustees Audit Committee for review and approval. The audit plan is based on a risk assessment methodology, as well as requests from management.

6. Documentation of Information Technology System

- System Design
- Retention of System Documentation

System Design

The University maintains documentation that describes system procedures, practices, and workflows. The Xtender system spans the efforts of four IT teams. The Enterprise Storage team provides the data storage hardware. The Systems team provides the servers and virtual infrastructure. The database team provides the database and related support and the Xtender team manages the application. Each team maintains documentation for their systems. This documentation also identifies system software and hardware and captures the system environment in terms of the organizational structure, functions and responsibilities, and system processes. It explains how the system operates from a functional user and data processing point of view. Documentation is reviewed and updated by IT staff annually or upon implementation of a new information technology system. Such documentation maintained by the University includes:

- Procedural manuals
- System documentation
- Security backup and disaster recovery procedures as a part of the ITCS Disaster Recovery Plan

Retention of System Documentation

During the period of use for Xtender, one set of all system documentation will be maintained for the active system and will be maintained until all data created by Xtender has been destroyed or transferred to a new operating environment or until the expiration of the applicable records retention requirements. All such documentation is listed in the University's records retention schedule.



7. Digital Imaging Program Documentation and Procedures

- System and Procedural Documentation
- Training
- Indexing and Metadata
- Auditing and Audit Trails
- Retention of Original and Duplicate Records

System and Procedural Documentation

The IT department is responsible for preparing and updating detailed procedures that describe the process followed to create and manage imaged electronic records. This documentation is maintained on the official Xtender website at [Xtender Document Imaging | Help | ITCS](#). The IT Systems team maintains all hardware and associated documentation. Current procedures are on a shared network resource and will be maintained to ensure the appropriate steps are followed and to ensure reliable system documentation will be available, as required by law for judicial or similar proceedings.

Each workstation designated as a scanning station will have, at a minimum, the following hardware and software, unless the scanner is connected by means of a network interface:

- Document/image scanner authorized by IT
- Driver software for scanner as provided by manufacturer
- Access to online instructions, maintained by IT staff, describing in detail the steps required in the scanning process. The instructions will also describe how to:
 - Create and delete a batch
 - Index a document
 - Log in and out of Xtender

Training

Department managers are responsible for ensuring record creators are trained in all aspects of Record Management and Retention. New users must complete the online Cornerstone training before receiving security access to scan or index records. Components of the training will include logging into the system, creating documents, indexing, quality control, security and user roles, and deleting documents. If a user improperly indexes or scans a document, the department manager will address this occurrence with the user and remedial training will be required. Additionally, the failure by any users to comply with the requirements of the regulation or these procedures may also result in disciplinary action, up to and including dismissal.

Indexing and Metadata

All imaged records must be indexed sequentially to facilitate efficient retrieval, ease of use, and up-to-date information about the images stored. This index should capture the content, structure, and context of the imaged records and will be developed by IT staff prior to the implementation of any imaging

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system. It should also be indexed according to guidelines set by the Department of Natural and Cultural Resources. Metadata will be maintained in accordance with the guidelines provided in Section 4, *Maintenance of Trustworthy Electronic Records*.

Auditing and Audit Trails

Staff trained to conduct imaging will conduct a quality control audit following the imaging of a record to ensure that the following features of the imaged record are legible:

- Individual letters, numbers, and symbols
- Combinations of letters, numbers, and symbols forming words or sentences
- Graphics such as signatures, logos, and pictures
- Other features of records such as color, shape, texture, etc., that relate to the content of the information

Record creators will periodically review the process of committing documents to the system, audit imaged records for accuracy, readability and completeness. Department managers will also periodically audit imaged records for accuracy, readability, and reproduction capabilities before the original documents are destroyed. Written quality control documentation will be prepared indicating the sampling of records and what remedial procedures were followed if the expected level of accuracy was not achieved. Remedial procedures may include retaking the online training class offered by the Xtender team and/or one-on-one retraining by an experienced staff person.

IT Staff will maintain security in Xtender and provide, upon request, documentation of a specific employee's level of access and operational privileges permitted. In addition, IT Staff will provide audit trails of specific actions as warranted. Department managers and application owners will review security access to documents a minimum of twice annually.

Retention of Original and Duplicate Records

To obtain permission to destroy original records following imaging, the department will complete the form, *Request for Disposal of Records Duplicated by Electronic Means*. For each records series identified for scanning, the University chief records officer must approve the destruction of the original records. Permanent records may be imaged for ease of access, but the original documents may not be destroyed unless an analog copy exists prior to the records' destruction.³

³ Any permanent records maintained in electronic form must also exist as a paper or microfilm preservation duplicate copy in compliance with the Department of Natural and Cultural Resources *Human-Readable Preservation Duplicates* policy ([Public Records Requiring Human Readable Preservation Duplicates](#)).

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Destruction of original records is allowed only after quality assurance has been conducted on the imaged records, necessary corrections have been made, the electronic records system is audited for accuracy, and the destruction of records has been approved.

If digital images replace the original records and assume all legal authorities, these scanned records will be considered the record copy and must be maintained for the specified retention period defined in the appropriate records retention and disposition schedule.⁴ The retention period is considered to have begun when the original document was created, not when the electronic version was produced. Any hard copy generated from the imaged records will be considered the University's duplicate "working" record or reference copy.

8. Other Electronic Records Management Practices

- System Planning
- Security and Disaster Backup and Restoration

System Planning

The University maintains records in the same format they were produced. In some instances, owing to preservation needs, workflow coordination of geographically dispersed units, or to better comply with laws and policies concerning public access to records, the University may provide access in a format other than the original. Some departments are transitioning from paper records to records digitized by the University's in-house Xtender imaging system. The University plans for hardware updates approximately every five years. If hardware maintenance is maintained, the life span may exceed 5 years. Hardware updates are based on two things:

1. The hardware aging out and needing to be refreshed
2. Software or other requirements may dictate newer hardware

In either instance, the IT department plans and budgets for the new hardware so the replacement can be scheduled and coordinated with all affected teams.

Software updates are planned based on release of new features, security/bug fixes, or specific versions needed to integrate with other Banner components.

⁴ The Society of American Archivists *Glossary of Archival and Records Terminology* defines record copy as "the single copy of a document, often the original, that is designated as the official copy for reference and preservation." Available at [Society of American Archivists Glossary Reference](#).

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Security and Disaster Backup and Restoration

The University has a disaster recovery plan for its electronic data in place, which includes contact information for data recovery vendors and information about backups of all data. Security backups to protect against data loss are generated for all but the most transitory of files. Routine backups are conducted daily and are stored in secure off-site storage. Daily server backups are retained on disk while monthly backups are kept on tape. Data backups (Xtender documents) are retained on disk for daily/monthly backups. Database backups (daily and monthly) also are retained.

9. Compliance and Electronic Records Self-Warranty

The acknowledgment of this Xtender Electronic Records and Imaging Regulation and Procedures document by all signing employees below memorializes the intent to adhere to the rules set forth in this regulation. Furthermore, this section shall be used as a self-evaluation tool to ensure that electronic records produced by the University are created, reproduced, and otherwise managed in accordance with guidelines for electronic public records published by the North Carolina Department of Natural and Cultural Resources. If scanned records are intended to take the place of original paper records, departments/offices must submit the *Request for Disposal of Records Duplicated by Electronic Means* form.

Each signatory should initial each element for certification, print his/her name on the Approved by line, fill in the job title, and sign and date the form.

IT Professional

The IT Professional is the person responsible for providing technical support to the records custodians and who may be involved in infrastructure and system maintenance. The IT Professional certifies that:

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Audit trails document the identity of the individual who creates or deletes documents, the time/date at which the event occurs, and the ID of the application being modified, as well as failed login attempts.

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Audits:

- are performed periodically to confirm that the process or system produces accurate results.
- confirm that procedures followed are in accordance with the University's documentation.
- are performed by an independent source, the University's Office of Internal Audit, as described in section 5 of this document.
- are adequately documented.

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The process or system hardware and software are adequately documented.

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All records, including permanent records, conform to all file format, file naming, and digital preservation guidance produced by the Department of Natural and Cultural Resources.

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Backup procedures are in place and comply with best practices as established by the Department of Natural and Cultural Resources.

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Successful disaster recovery testing is completed at least once every two years.

Approved by: Garrett Killian Date: 1/2/2025 | 2:04 PM EST

Title: Business & Technology Application Specialist

Signature: DocuSigned by: Garrett Killian
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University Chief Records Officer

The University Chief Records Officer coordinates records management training and compliance. The University Chief Records Officer certifies:

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Maintenance of a compliance program to ensure quality assurance for document surrogacy.

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Training for records retention and disposition of electronic records is provided to users.

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Compliance with Xtender security reviews for application owners.

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Participation in the design and implementation of University electronic records initiatives.

Approved by: Alston Cobourn Date: 1/6/2025 | 9:11 AM EST

Title: University Records Manager

Signature: ^{DocuSigned by:}
Alston Cobourn
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Vice Chancellor

The Vice Chancellor exercises oversight for document imaging at the institution level. The Vice chancellor certifies:

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Xtender is an official document imaging solution of East Carolina University.

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The University's Electronic Records and Document Imaging Regulation and its implementing procedures establishes the University record retention practices for Application Xtender (Xtender) in compliance with the policies of the Department of Natural and Cultural Resources.

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The University shall implement information technology security procedures necessary to conform with the obligations found in the Xtender Electronic Records and Document Regulation and Procedures.

Approved by: Stephanie Coleman Date: 1/7/2025 | 4:22 PM EST

Title: Vice Chancellor for Administration and Finance

Signature: ^{Signed by:}
Stephanie Coleman
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DIVISION OF ARCHIVES AND RECORDS — GOVERNMENT RECORDS SECTION

MAILING ADDRESS:	http://archives.ncdcr.gov	LOCATION:
4615 Mail Service Center	Telephone (919) 807-7350	215 N. Blount Street
Raleigh, N.C. 27699-4615	Facsimile (919) 715-3627	Raleigh, N.C. 27601-2823
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Records Custodian/Managerial Staff

The records custodian is the person responsible for creating records or managing the staff who create records.⁵ The records custodian certifies upon the completion of institutional training requirements that:

The records created, scanned or duplicated by electronic means in this office are prepared in accordance with these guidelines as indicated by the following statements:

- Quality - Records are legible, accurate, and complete.
- The records are produced or reproduced as part of a regularly conducted activity.
- Documented procedures are in place and followed when the records are created, copied, modified, or duplicated.
- The person who creates, copies, modifies, or duplicates records receives formal training on detailed system procedures prior to records preparation.
- Details of the training received are adequately documented through written policies and procedures.
- Employees complete training and a record of completed training is maintained by Cornerstone.

This University will comply with the best practices and standards established by the Department of Natural and Cultural Resources as published on its website.

Each department/office will submit to the University Chief Records Officer the form, *Request for Disposal of Records Duplicated by Electronic Means*, to seek approval for the destruction of original records that have been converted from paper to electronic record.

Departmental managers and application owners will review security access to Xtender documents a minimum of twice annually.

Affected records creators will be trained on the proper creation and maintenance of electronic records.

Imaged records will be periodically audited for accuracy, readability, and reproduction capabilities before the original documents are destroyed.

⁵ [G.S. § 132-2](#) specifies, "The public official in charge of an office having public records shall be the custodian thereof." Therefore, the individual certifying this section will likely be the head of the organizational unit (i.e., department or office).

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Audits:

- are performed periodically to confirm that the process or system produces accurate results.
- assures that procedures followed are in accordance with the University's documentation.
- are performed routinely on files to ensure no information has been lost.
- are adequately documented.

Records custodians and managerial staff certify their compliance through completion of online training for all new users.

FOR DEPARTMENT OF NATURAL AND CULTURAL RESOURCES USE

Approved by: Mark Holland Date: 1/14/2025 | 2:49 PM EST

Title: Supervisor, Records Analysis Unit

Signature: Signed by: *Mark Holland*
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