Case #3:

A Collaborative, Proactive Approach for the Electronic Records Lifecycle
The Alabama State Electronic Records Project (ASERP)

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OVERVIEW: Government repositories have always had to balance thorough processing with providing prompt access to government records. The shift from paper-based to electronic recordkeeping systems amplifies this challenge, as electronic records are less stable and more duplicative than their paper predecessors. Without proper management and preservation measures before transfer to the archives, electronic records are in danger of becoming lost or corrupt. Without careful processing, electronic records are more likely to make private or sensitive data accessible to researchers in the reference room or to mass audiences online.

Between January 2017 and December 2019, the Alabama Department of Archives and History (ADAH) and the Alabama Office of the Governor collaborated on a project with grant funding from the National Historical Publications and Records Commission (NHPRC). The Alabama State Electronic Records Project (ASERP) aimed to increase the ADAH’s capacity for managing electronic records and to scale this capacity to include all state agencies. Staff collaborated to develop new workflows for all stages of the electronic records lifecycle, from records management, to appraisal, to processing, to preservation, to reference.

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Introduction and Institutional Context

The Alabama Department of Archives and History (ADAH), founded in 1901, is the official repository for records created by state agencies in Alabama; the department also collects private manuscript materials. At the ADAH, we have long recognized the need for efficient processing and expeditious access to government records. Beginning in the 1980s, our minimal processing workflow for traditional formats consisted of accessioning state agencies’ permanent records, creating box-level inventories using the descriptive information provided by the agency, adding the collection information to the catalog, shelving the boxes, and opening the records for research. Mark Greene and Dennis Meissner’s seminal 2005 article “More Product, Less Process” (MPLP) advocated a streamlined approach very similar to existing practice at the ADAH.¹

According to the Council of State Archivists, the amount of electronic records in state and territory archives in the United States grew by 1,693 percent between 2006 and 2016.² Ingesting, processing, and providing access to these large quantities of electronic records requires new procedures, equipment, and storage capacity. At the same time, archivists need to collect these electronic records early and proactively in order to facilitate their long-term interoperability, retrieval, and access. At the ADAH, digital technology has expanded access to the archives, but has also brought about a shift in privacy concerns. When paper records are made available to the general public in a research room environment, the disclosure of private or sensitive information is limited only to those researchers who access the records directly. In online collections of electronic records, however, the disclosure of private or sensitive information to a large audience can result in privacy breaches of greater magnitude.

Like many state archives, the ADAH began developing an electronic records program by taking small steps addressing specific issues. In 2005, by which time most Alabama state agencies had established an online presence, we began crawling agency websites and social media sites using Archive-It, the web archiving service of the Internet Archive. In 2009, the ADAH became a participant in the Persistent Digital Archives and Library System (PeDALS), a research project in collaboration with the Library of Congress and six other state archives. The goals of PeDALS were to develop and test tools and methods for curating, processing, preserving, and providing access to electronic government information of long-term value, and to build a community of shared practice among state archives.³ PeDALS helped the ADAH staff focus on electronic records and incorporate electronic records management into guidance documents and training given to state and local officials. PeDALS established a foundation for an electronic records program, but hardware issues, time constraints, and the end of grant funding in December 2011 hindered the program’s progress.

In 2011, after Governor Bob Riley left office, we received the first transfer of electronic records from the Office of the Governor in our institutional history. The PeDALS team hoped to process and make available electronic records from Governor Riley’s office as well as a few other agencies, but the aforementioned hurdles delayed this work. To build on our capacity for processing, preserving, and providing access to electronic records, Tracey Berezansky, former Assistant Director for Government Records, pursued and received in 2016 a grant from the National Historical Publications and Records Commission (NHPRC) to implement a three-year electronic records project.

The Alabama State Electronic Records Project (ASERP), which started on January 1, 2017, formed a two-tier approach. Working externally with stakeholders, Appraisal staff initially worked with the Office of the Governor on assessing the status of their electronic records and developing and implementing training components on electronic records management. Emphasis then shifted to the identification and application of strategies for accessioning permanent electronic records from all state agencies. Working internally, Collections staff addressed the backlog of Governor Riley’s electronic records. As the Office of the Governor creates a large volume of historically significant records, this agency served as a focal point to begin developing processing and access procedures for electronic records.

A project team with staff from the Appraisal, Collections, and Reference Sections of the ADAH instituted weekly meetings to review progress on objectives, discuss issues as they arose, and encourage communication. Throughout ASERP, we encountered various challenges, from staff turnover, to Governor Bentley’s abrupt resignation in 2017, to unexpected privacy concerns during the 2018 gubernatorial election. Nevertheless, we were able to develop our processes for electronic records to create better products for researchers. Intersectional collaboration increased our awareness of each other’s functions and informed our perspective on all stages of the records lifecycle, from training, to transfer, to processing, to access. ASERP blurred the lines between the appraisal, collections, and reference functions at the ADAH. With the input of the Collections and Reference sections, Appraisal staff have been able to incorporate considerations for processing and access into their guidance and accessioning procedures. Collections staff, in collaboration with Appraisal staff, are more involved in the transfer of high-priority records. Stakeholders from all stages of the records lifecycle are able to contribute to solutions for providing access in the digital age.

**Part I: State Agency Education and Transmittal of Electronic Records**

Appraisal staff began the project by collaborating with Governor Bentley’s office on records management. Project Archivist Amanda Shelton spearheaded the work. In March 2017, she introduced herself and the project to Governor Bentley’s staff and conducted interviews with staff members representing every sub-office. The survey included questions about the staff member’s activities, the records produced in the course of those activities, current records management systems, communication practices, and technology use. The survey showed that staff recordkeeping systems varied widely. Some staff saved files on local desktops and name
drives, while others used shared drives. The office did not use a universal electronic file-naming convention and did not distinguish temporary files from permanent files. While most staff could find any file using a Windows search tool, the nonstandard organization and inconsistent file naming would increase processing time and delay accessibility upon transfer to the ADAH. The survey also found that the office lacked a standard records transfer process or designated point of contact for departing employees, which increased the risk of records loss. Fortunately, the Governor’s staff expressed openness to receiving records management recommendations.

Appraisal staff initially planned to work with Governor Bentley’s staff for the first two years of the project on organizing each sub-office’s electronic records so as to facilitate the orderly transfer of the administration’s permanent records during the project’s third year. In April 2017—only a few months into the grant—Governor Bentley resigned, leaving office nearly twenty-one months earlier than scheduled. When the resignation seemed imminent, Appraisal staff developed a transition planning document, including frequently asked questions and instructions for transferring both paper and electronic records. Guidance documents were designed to provide immediate assistance for staff during the transition to prevent inadvertent records loss. Immediately following the resignation, ADAH Director Steve Murray sent letters to key gubernatorial staff reminding them of their responsibilities for the retention of public records and offering the assistance of the ADAH staff. Four archivists spent several days in the governor’s office and served as a resource for gubernatorial staff during the transfer process. As Lieutenant Governor Kay Ivey became Governor and for months into her tenure, staff continued to work on transferring records from Governor Bentley’s administration.

The Office of the Governor transferred 175 cubic feet of paper records, including administrative files, scheduling files, and subject files. Governor Bentley reached out personally to provide a copy of his gubernatorial website, public Facebook page, campaign Facebook page, two binders of materials related to his appointment to fill a vacancy in a US Senate seat, and a reading copy of his resignation speech. Additionally, the Office of the Governor transferred 2.5 terabytes of photographs and video files on one external hard drive. Appraisal staff worked with the Alabama Office of Information Technology (OIT) to transfer the email accounts of forty-two staff members in the form of fifty PST files, totaling 237 gigabytes; however, only email accounts from staff employed at the end of the term were available for transfer. Due to the concern of privileged information contained in Governor Bentley’s electronic office files, these permanent electronic records were not released for transfer to the ADAH. The Office of the Governor did, however, gather and segregate Governor Bentley’s electronic records from the electronic records of the new gubernatorial administration. The office agreed to transfer the permanent records once attorneys conduct a review.

Appraisal staff worked with Governor Ivey’s administration during the transition and after her election to a full term in 2018. The Office of the Governor had placed a litigation hold on email accounts at the end of the Bentley administration and agreed to continual litigation holds for email accounts in the Ivey administration so that staff turnover would not result in the loss of emails, which are to be transferred to ADAH at the end of the administration. Rebecca Hébert, Grant Project Director and Appraisal Section Head, conducted records management training
with all staff with an emphasis on electronic records management, the use of shared drives, and standard nomenclature. The Project Archivist hosted another round of records surveys, conducted one-on-one training for incoming staff, and held weekly office hours to maintain regular contact.

When the Project Archivist left in May 2018, Appraisal work shifted to scalability with the new Project Archivist, Kathleen Brennan. Appraisal staff conducted a survey with state agencies in 2018 during their required annual records management reporting to identify awareness around permanent electronic records. In some cases, annual reports and newsletters created only a few years ago were not accessible. Brennan began requesting that state agencies transfer their most frequently published permanent born-digital records: annual reports, newsletters, and bulletins. This initiative resulted in thirty-five state agencies transferring state publications which document agencies’ critical activities, updates, and industry developments. As these electronic files are transferred, Appraisal staff name files with a standard nomenclature to facilitate quicker ingest into ADAH’s electronic records preservation platform. Appraisal staff also reached out to the Alabama House of Representatives and the Alabama Senate to collect their born-digital journals, which resulted in the successful transfer of the 1998-2018 journals of both legislative bodies.

While continuing to focus on scalability, Appraisal staff came to understand that a small staff cannot keep up with training the constantly shifting staff of a constitutional office. The final Project Archivist, Katie Ray, began in June 2019 and focused the project’s efforts on developing written records management guidance. While the Office of the Governor’s Records Disposition Authority (RDA) identifies which records are permanent, incoming staff seemed open to guidance on how to create and organize their records. Since the Communications Office creates records that serve as the most visible legacy of the Office of the Governor, Appraisal staff created a Records Management Guide for this office including detailed guidance for managing each permanent record series that it creates.

Appraisal staff continued to scale the project. Building upon the previous year’s request for state agency publications, Ray collected current year documents and reached out to agencies who had not yet transferred electronic records. Appraisal staff also requested that state licensing boards transfer electronic rosters and registers. Connecting the transfer of permanent electronic records to the required submission of an agency’s annual records management report helped to facilitate the transmittal of electronic records. By the end of the grant, the ADAH had collected electronic records from approximately one third of state agencies. The initial work undertaken by Appraisal staff on annual reports, newsletters, and rosters increased the ADAH’s proactivity in soliciting electronic records, provided another avenue for building

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4 Electronic Records Collections, Alabama Department of Archives and History, [https://adah.access.preservica.com/](https://adah.access.preservica.com/).
relationships with state agencies, and expanded the scope of the ADAH’s electronic records collection initiative.

Part II: Processing and Preserving Electronic Government Records

While Appraisal staff worked on guidance documents, procedures, electronic records transfer, and scalability, Collections staff processed electronic records from Governor Riley’s office (2003–2011). Before the project began, Governor Riley’s office had transferred 442 cubic feet of paper records, including administrative files, scheduling files, project files, correspondence, task force records, and communications records such as proclamations, commendations, appreciations, and clippings. The ADAH had also accessioned 1.87 terabytes of his office’s electronic records, including emails, office files, digital photographs, videos, and data from an Intranet Quorum (IQ) database. IQ is a proprietary constituent outreach and workflow management platform designed by Lockheed Martin for use by government agencies. To tackle decisions about processing, the ASERP team formed workgroups of three to six staff members.

Governor Riley’s electronic office files, which totaled three thousand files or 1.16 gigabytes, were organized inconsistently in folders. A processing workgroup decided that more extensive processing is required when making these files accessible online. Collections staff member Rachel Smith used Duplicate File Finder to remove copies of files and then renamed individual files with descriptive information following a standard file-naming convention. Renaming files took the place of adding metadata to each document. Smith opened every file to scan quickly for the presence of phone numbers and social security numbers or other sensitive information. If such concerns were present, she used Redact-It to obscure this information. The version used did not allow for batch processing. During the review, Smith weeded redundant or transitory files such as hotel bookings, flight information, and staff birthday lists but retained drafted documents due to the time and effort involved in distinguishing drafts from final versions. Collections staff ultimately created three separate series: one each for the Chief of Staff, Policy Office, and Press Office. Fortunately, since the office files made up only 1.16 gigabytes of the 1.87 terabytes of Governor Riley’s electronic records, manual review was not time intensive. When processing larger volumes of files in the future, the ADAH will consider more automated redaction and processing solutions.

While processing Governor Riley’s office files, the ADAH identified Preservica for use as a digital preservation platform. Built on the Open Archival Information System (OAIS) reference model, Preservica allows archivists to perform automated workflows in the functional areas of ingest, access, data management, preservation activities, and administration. The ADAH selected Preservica Cloud because of limited in-house IT support and the need for out-of-the-box functionality that would work immediately without configuration. Preservica deploys automatic updates and supports the entire spectrum of records maintenance, including storage, preservation, and access. Staff attended training sessions, mostly online, about Preservica.

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workflows; consulted with other state archives by phone and email; and learned through hands-on experience. The ADAH initiated a contract with Preservica and ingested Governor Riley’s office files in October 2017, launching public access in January 2018.

At 1.58 terabytes, photographs made up the largest portion of the 1.87 terabytes of electronic records from Governor Riley’s office. A photographs workgroup created a plan for weeding and processing more than 230,000 of Governor Riley’s digital photographs as a portion of the photographs were poor quality or duplicative photographs of the same event and people. The workgroup decided to item-level process and weed the photographs in order to save space and associated storage costs and to remove bulk that users would otherwise have to sort through. Staff members eliminated true duplicates and then developed weeding guidelines which required digital photographs to reflect Governor Riley’s speaking style, show different angles when possible, and feature every person photographed at a given event.7 After weeding the photographs, only 649 gigabytes remained of the 1.58 terabytes (34.7 percent). Staff renamed these photographs with a file renaming tool and published them on Preservica in November 2019.8

Especially with larger electronic records collections, ADAH staff will continue to evaluate best practices and adapt a pragmatic approach. In doing so, they realize that processes can change as they attempt to apply theory to our experiences. For Governor Riley’s photographs, the workgroup held extensive discussions and decided that when the staff photographer shot in both RAW and JPEG, only the RAW files would be preserved. In cases where the photographer edited a photograph, both the original RAW and processed JPEG would be preserved. The workgroup chose RAW for the detail, quality, and the ability to correct images, especially for underexposed photographs. To provide better access and create more stable versions of the photographs, staff used Preservica to migrate the images from RAW to TIFF, losing the benefits of maintaining the RAW image. The public accesses the TIFF images online but can request the RAW photographs from the ADAH. For the Bentley Collection, Collections staff will continue to weed the photographs for the long-term benefits of having fewer duplicative images; however, staff decided to reverse the decision regarding format and keep only the JPEG where both RAW and JPEG formats existed. The primary consideration is that JPEG photographs are already processed and ready for printing, even when the photographer conducts no post-processing. This choice hampers users’ ability to improve photographs but provides better quality to the everyday user who accesses our collections.9

Another series, Governor Riley’s emails, consisted of approximately 3,600 messages from a few staff members. Before the project began, ADAH IT staff had converted the emails from PST to

8 “Governor Bob Riley (2003-2011),” Electronic Records Collections, Alabama Department of Archives and History, https://adah.access.preservica.com/uncategorized/50_7f3b7ab-6800-4da9-bf78-b08e51f5cc1b/.
PDF format for researchers to access on a designated workstation in the ADAH Research Room. Collections staff decided that additional processing was not needed at this time. For Governor Bentley’s emails, an email workgroup briefly conducted an initial survey which identified date ranges, potential security concerns, personal usage, and filing structures in these email accounts. The workgroup discussed following the model that the Library of Virginia used to process Governor Tim Kaine’s email, but this work fell outside the scope of the grant. Access to Governor Bentley’s email is currently provided on a per-request basis.

Processing Governor Riley’s Intranet Quorum (IQ) data proved to be a challenge. Governor Riley and his successors have used IQ to track interactions with constituents, including correspondence and phone calls. When Governor Riley left office, his IT staff transferred a physical server containing IQ data and provided the administrator name and password. Since the IQ system is proprietary, ADAH IT staff needed to set up VPN access for Lockheed Martin so that they could remotely pass through the firewall to the server and extract the data. For a fee, Lockheed Martin provided forty-six tables of DAT files with sparse instruction sheets detailing how the fields were related, and seven folders containing thousands of attachments to the Archives. Based on in-house IT guidance, Rachel Smith opened the DAT files in Word Perfect, saved them as TXT files, and converted the TXT files to CSV (Comma Separated Value) files. Collections staff member Charles Johnson then migrated the CSV data files into Microsoft Access tables to recreate the relational structure of the original database, which required a substantial commitment of time. Once staff had cleared the hurdles in gaining access to the content, they discovered the presence of sensitive topics and confidential information. Constituent correspondence is frequently of an intensely personal nature and can include descriptions of issues such as domestic abuse, combat-related PTSD, and child custody disputes. Collections staff are still revising redaction policies and procedures before providing access to the information contained in IQ.

Another goal of the project was to address an existing backlog of electronic records. In the early 2000s, government transfers of paper records increasingly contained removable media devices—for example, a lone CD or floppy disk in a box of paper subject files—but we did not have procedures for discovering and separating them. A media workgroup inventoried boxes considered most likely to contain removable media based on date span and found more than 6,000 devices interfiled with paper records. Based on the importance of the transferring agency, the workgroup prioritized about 2,000 of the devices. Workgroup members copied files from the fragile devices to our server, placed the devices into labeled bags, inserted separation sheets in the original boxes, and moved the devices to a separate electronic media storage area. Collections staff are postponing the disposition of these external devices until the full implementation of a distributed storage plan.

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Collections staff also addressed incoming electronic records collections from other state agencies, beginning with the legislative journals of the Alabama House and Senate. These journals were the first non-Governor electronic records in Preservica. As the electronic records were already organized and required no redaction or review, the files were simply converted to readable formats and renamed before ingest. As Appraisal staff collected state publications from agencies and renamed them, Collections staff created new state agency collections with unique collection numbers in Preservica.

The ADAH maintains three copies of its electronic records collections. ADAH operates an in-house server dedicated to electronic records collections, a second shared in-house server with explorations of an external managed server, and the cloud. Original unprocessed collections are maintained in these three locations, with the third in Amazon Web Service’s Deep Archive. The ADAH only expects to access this copy in a catastrophic emergency, which allows for reduced cost. While larger electronic records collections are being processed, the originals are maintained with an occasional backup of the in-progress collection on the in-house server. After processing is complete, they are ingested into Preservica and the unprocessed collection is discarded. Backups of the processed collections remain on the department servers, as files ingested in Preservica are using AWS cloud. While staff continue to adapt procedures, the Collections Section’s work on processing and preserving our backlog of legacy media as well as the Governor’s electronic office files, photographs, emails, and IQ data enhanced access for researchers and built on the foundations of our electronic records program.

Part III: Redaction of and Access to Electronic Records

ASERP helped the ADAH become more proactive in collecting electronic records and enhanced our electronic records procedures, but obstacles posed by private and privileged information ultimately caused us to reexamine our workflow for both paper and electronic records. Many archivists have suggested that more responsibility should fall on records creators to flag potential concerns during the appraisal and transfer process.11 Often, however, agencies are unaware of the sensitive contents of their records or may assume that archivists will redact or restrict such content. Processing archivists can distinguish common categories of restricted data but cannot possibly distinguish every potential concern without processing at the item level, which would in turn create an unacceptable barrier to access due to time and staffing restrictions.

The ADAH has a legal obligation to restrict some information; for example, Alabama Act 2006-611 prohibits state agencies from “placing or otherwise revealing the Social Security number of a person...on any document that is available for public inspection...”12 Regardless of whether archivists have a legal requirement to restrict private or privileged information, breaches originating in the research room or in online collections may compromise the trust placed in the archives by records creators. Prior to the use of the internet and online communications platforms, the risk of sensitive content being found and widely disseminated by researchers was small. We relied on researchers to share information in an ethical fashion, which typically involved reporting the information contained in records rather than directly copying records. Today, visitors to the research room need only a smartphone to share private or otherwise sensitive content in paper records with a wide audience, and online researchers can share records with the click of a button. If these breaches of privacy occur, they can foster distrust amongst records creators and hesitancy to transfer records.

During Governor Ivey’s reelection campaign in 2018, a researcher examining Governor Ivey’s paper administrative files from her tenure as lieutenant governor discovered printed emails containing personal contact information within the ADAH holdings. The researcher photographed the emails and shared the images with an online source, which in turn posted unredacted copies of the printed emails. We briefly closed the files while Collections staff inspected them for information posing a potential security risk and redacted such information. This situation highlighted the new risks that come with archival access in the digital age and heightened the Office of the Governor’s sensitivity to the potential ramifications of privacy breaches.

We created a workgroup on privacy and privilege as a forum for discussing these concerns. The group considered topics such as the Health Insurance Portability and Accountability Act (HIPAA), the Federal Educational Rights and Privacy Act (FERPA), vital records, attorney-client privilege, attorney work product, and copyright.13 For each topic, the workgroup reviewed state and federal laws, case law, archival case studies, and relevant records in current and anticipated future ADAH holdings. The privacy workgroup is helping us to adjust our workflows and seek a way to ethically balance access with the need to screen for and restrict private information.

Ultimately, ADAH revised workflows for both paper and electronic records to better detect sensitive information, increase the effectiveness of processing, and balance the principles of privacy and access. Appraisal staff work with state agencies transferring permanent records to complete as much groundwork as possible before transfer to the ADAH, ensuring that records are systematically organized with a box listing and, ideally, an accurate file listing. In this way, we expedite processing by shifting responsibility to records creators when possible. Upon transfer and before formally accessioning the records, Appraisal staff verify the accuracy of the

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box and file listings and flag privacy concerns for both paper and electronic government records. If Appraisal staff find removable media or potential privacy issues, they note their findings to Collections staff. For exceptionally complicated or disorganized transfers, they may take the records into temporary custody to sort the records. Appraisal staff handle the renaming of routine permanent electronic records such as state publications and conduct training so that larger transfers of electronic records arrive in a more organized manner. This preemptive work enhances access to all permanent records.

Conclusion

Electronic records can become lost or corrupt within a few years after creation and will not be accessible for future generations unless archivists actively and promptly accession and process them. ADAH Appraisal staff have made strides in proactively soliciting state agency electronic records on an annual basis and plan to expand the scope of their collecting efforts each year. Furthermore, they continue to collaborate with state agencies to develop tailored records management guidance. In August 2019, the ADAH hired a Project Archivist situated in the Appraisal Section to work exclusively on records management with the Office of the Secretary of State and hope to pursue other targeted projects in the future.

ADAH staff have become active seekers of electronic records by soliciting electronic records on an annual basis. By engaging with agencies, educating them about electronic records management, and involving them in pre-processing tasks such as file naming, archivists can shape the archive and help agencies transfer well-organized electronic records in greater quantities. Intervention for records creators also helps with paper records management. The time invested in outreach and training is reaped during processing; if agencies implement even some recommendations, processing becomes more efficient.

Thanks to the NHPRC, we made significant progress in processing and providing access to Governor Riley’s records. We scaled the project to include other state agencies and met our goal of increasing institutional capacity for managing, preserving, and providing access to permanent electronic records. ASERP emphasized the importance of making decisions and moving forward with our electronic records program, allowing the freedom to change course as new information or resources became available. We learned that electronic records processing does not have to be perfect. Once we got started, we finished projects sooner than we anticipated.

As our electronic records program continues to grow, ADAH will continue to research solutions for automating redaction and streamlining our procedures for providing access. In adherence to the professional values of privacy and access and in pursuit of balancing these two principles, Collections staff scan items for sensitive data as efficiently as possible. This practice balances timely access with a concern for protecting private information within the confines of our current technological capacity for automation.
Before ASERP, the appraisal, processing, and reference functions at the ADAH were like spokes on a wheel. Each section worked on a core stage of the records lifecycle but dealt exclusively with that stage. ASERP’s weekly meetings provided an opportunity for cross-sectional exchange and allowed staff to consider how the actions of one section impact the work of other sections. ADAH found weekly meetings to be one of the most valuable outcomes of the project and plan to continue these meetings after the grant-funded portion of the project is complete. As a result of these meetings, each section’s work blended together to consider the entire records lifecycle. Collections and Reference staff have increased input in records management guidance, since that guidance affects processing and access to records. Appraisal staff now perform more processing functions to better prepare records to enter the next stage of their lifecycle. As a group, ADAH collaboratively developed workflows that consider the entire records lifecycle, including creation, management, transfer, processing, preservation, and access.

The ADAH is committed to the accessibility of government records in promoting the transparency and accountability of public institutions and is equally committed to providing appropriate protection of private and confidential information under standards dictated by state and federal law and professional ethics. The ADAH will continue a rigorous, consistent review of its education, accessioning, processing, and access policies as best practices evolve within the archival community.

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