



TITLE

**SCANNING AND DIGITIZATION**

SCOPE

Provincial

DOCUMENT #

1191

APPROVAL AUTHORITY

Connect Care Executive Committee

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November 25, 2021

SPONSOR

Health Information Management

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Not applicable

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Records Management Policy (#1133)

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November 25, 2024

**NOTE:** The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definitions section.

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## OBJECTIVES

- To set out the minimum requirements for **scanning** and **digitization** processes to ensure the reliability, authenticity, and integrity of the resulting electronic **records** as required for clinical, business, and legal purposes.
- To ensure compliance with the AHS *Records Management* Policy and associated policies, procedures, and standards when scanning or digitizing **source records**.

## APPLICABILITY

Compliance with this document is required by all Alberta Health Services employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of Alberta Health Services (including contracted service providers as necessary).

## ELEMENTS

### 1. Scanning and Digitization

- 1.1 This Policy applies to the conversion of paper and other non-digital records into an electronic format that will become the **official record**.
- 1.2 When electronic records containing individually identifying information are stored in a **repository**, it is necessary to review the AHS *Privacy Impact Assessments* Policy to ensure requirements for **privacy impact assessments (PIAs)** are met.

## 2. Scanning and Digitization Process

- 2.1 Alberta Health Services (AHS) supports scanning and digitization processes that comply with the minimum requirements set out in this Policy.
- 2.2 The **department** shall establish a scanning and/or digitization process that is documented and implemented, in accordance with this Policy, as part of the ordinary and usual course of business.
- a) If the department is subject to an overarching scanning and/or digitization process, then the department is not required to establish their own process but shall follow the overarching process. For example, all scanning in Connect Care shall follow the *AHS Connect Care Scanning and Upload Criteria Process* and the *AHS Connect Care Quality Control, Auditing, and Reporting of Scanned Documents Process*.
- 2.3 The department's scanning and/or digitization process shall be approved by the business owner of the source records and outline accountability for the:
- a) authorization of the scanning and/or digitization process;
- b) acceptance of digitized records as true representations of the source records; and
- c) **destruction** of source records.
- 2.4 The department's scanning and/or digitization process shall also address:
- a) preparation of source records for scanning/digitization;
- b) technical specifications for digital capture;
- c) **indexing** requirements which include:
- (i) identification of **metadata** and its organization. The following metadata are mandatory:
- operator identifier;
  - date and time of digitization;
  - date of source record;
  - title of source record;
  - source record type; and
  - data fields required to fulfill retention calculation;

- (ii) additional mandatory metadata when scanning paper records, which includes the:
    - unique batch reference number (if applicable);
    - number of documents and number of pages in each; and
    - number of pages captured;
  - (iii) a process for auditing indexing quality controls, amending inaccurate index data, and tracking deleted or expunged records;
- d) implementation of a quality control plan and problem log to ensure the authenticity, reliability, and integrity of the scanned/digitized source records and indexing accuracy;
  - e) a process for exception management, equipment maintenance, and downtime processes;
  - f) implementation of a quality assurance plan aimed at auditing the resulting electronic records, digitization quality, and adherence to indexing and metadata requirements;
  - g) a timeframe for the destruction of eligible source records in accordance with Section 3 of this Policy; and
  - h) a regular review cycle that does not exceed two (2) years.
- 2.5 Health Information Management – Records and Information Management shall provide consultation and reference materials to support departments developing a scanning and/or digitization process.
- 2.6 The department shall provide a copy of the completed scanning and/or digitization process to Health Information Management – Records and Information Management.

### 3. Source Record Destruction

- 3.1 No source records shall be destroyed until there is a process established in accordance with the requirements in this Policy.
- 3.2 The department is responsible for determining whether there are any legislative, legal, or professional requirements for maintaining the source record. Where a requirement exists, the source record shall be retained as it remains the official record (see the *AHS Schedule of Documents Requiring Retention of Original Source Documents and/or Wet Signatures* for a list of known requirements to maintain the source record).

- 3.3 Electronic records created via a scanning or digitization process that complies with the requirements of this Policy may be considered official records and must be retained in accordance with the *AHS Records Retention Schedule*.
- 3.4 Electronic records created via a scanning or digitization process that do not comply with the requirements set out in this Policy, are considered transitory and the original source document continues to be the official record and must be retained in accordance with the *AHS Records Retention Schedule*.
- 3.5 A final audit shall take place prior to the destruction of source records by an **AHS representative** who is not a **contractor**, and who is knowledgeable of the source records digitized by the digitization process.
- 3.6 Departments shall be able to provide proof of completion of quality assurance activities in accordance with Section 2.4 f) of this Policy.

#### 4. Auditing of Scanning and/or Digitization Process

- 4.1 Health Information Management - Records and Information Management may audit scanning and/or digitization processes at any time to ensure compliance with this Policy.

#### DEFINITIONS

**AHS representative** means AHS employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of AHS (including contracted service providers as necessary).

**Contractor** means any affiliate, third party, non-employee, consultant, or agent or employee to the contractor, outsourcer, service provider, contract provider or business partner engaged by AHS to perform services for or on behalf of AHS.

**Department** means, for the purposes of this Policy, the organizational area that is responsible for developing the department scanning/digitization process and/or carrying out the scanning/digitization activities.

**Destruction** means the disposal of records by incineration, maceration, pulping, granulizing, shredding, or otherwise, with the objective of obliteration beyond any possible reconstitution.

**Digitization** means the process of rendering analogue recorded information into electronic (digital) form. Scanning is a form of digitization.

**Indexing** means the process of organizing information to enable easier retrieval and facilitate records management.

**Metadata** means structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.

**Official record** means the instance of a record that has the force of an original record and is authoritative, final, and complete.

**Privacy Impact Assessment (PIA)** means a documented process to assist AHS in reviewing the impact new projects might have on individual privacy.

**Record** means documents, data, or information of any kind, in any medium (e.g., paper, digital, and audio-visual media), and in any format (e.g., documents, spreadsheets, databases, emails, blogs, wikis, and website pages) created, received, recorded, and maintained by AHS as part of its services or business. This definition includes health records, but does not include computer software or any mechanisms that produce records.

**Repository** means a collection of AHS information where the information is organized, made accessible to authorized users, protected and stored for specified legal retention periods. A repository includes, but is not limited to, individual repositories and data warehouses.

**Scanning** means the process of producing a digital image from a paper document or record.

**Source record** means the original record that was digitized to create an electronic official record.

## REFERENCES

- Alberta Health Services Governance Documents:
  - *Access to Information (Physical, Electronic, Remote) Policy (#1105)*
  - *Collection, Access, Use, and Disclosure of Information Policy (#1112)*
  - *Corporate Contracting Policy (#1152)*
  - *Delegation of Approval Authority Policy (#1168)*
  - *Electronic Signatures Policy (#1190)*
  - *Information Classification Policy (#1142)*
  - *Legal Hold Procedure (#1133-04)*
  - *Official Records Destruction Procedure (#1133-02)*
  - *Privacy Impact Assessments Policy (#1145)*
  - *Privacy Protection and Information Access Policy (#1177)*
  - *Records Management Policy (#1133)*
  - *Records Retention Schedule (#1133-01)*
  - *Transitory Records Procedure (#1133-03)*
- Alberta Health Services Forms:
  - *Source Document Destruction Authorization Form (#18908)*
- Alberta Health Services Resources:
  - *Connect Care Quality Control, Auditing, and Reporting of Scanned Documents Process*
  - *Connect Care Scanning and Upload Criteria Process*
  - *Privacy Impact Assessment Management System*
  - *Schedule of Documents Requiring Retention of Original Source Documents and/or Wet Signatures*

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- Non-Alberta Health Services Documents:
  - *Alberta Evidence Act*
  - *Freedom of Information and Protection of Privacy Act (Alberta)*
  - *Health Information Act (Alberta)*
  - *Logging Audit Standard (Alberta)*

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