Letters to the Editor

Dear Editor:

In his article "When is the Future? Comparative Notes on the Electronic Record-Keeping Projects of the University of Pittsburgh and the University of British Columbia" (*Archivaria* 43), Paul Marsden cites the work of the Philadelphia Electronic Records Project to demonstrate that the University of Pittsburgh's functional requirements for record-keeping fail to establish sufficient provenantial context for electronic records. While it is not our purpose here to debate this proposition, we do feel compelled to address some misconceptions Mr. Marsden has regarding our implementation of the "business acceptable communications" (BAC) model.

First, for those readers unfamiliar with our project, we would like to briefly establish some context. The Philadelphia Electronic Records Project is a three-phase program development and research effort that has received over $193,000 in NHPRC funding. One of the project's goals is the development of a prototype system to evaluate the efficacy of using metadata to facilitate the management of electronic records. Seeking a partner in the project, the Records Department sought out City program units that were beginning the information system development process.

It was ultimately determined that the City's Human Resources Information System (HRIS) was a worthy candidate. First of all, the Records Department believes that the transactions to be initiated and completed within HRIS – everything from an initial hiring to attendance, leave, discipline, and retirement – are of great ongoing administrative significance. Furthermore, it has been the City's experience that personnel transactions of all kinds are often contested, and that incomplete or insufficient record-keeping is a factor in any number of grievances and lawsuits against the City. Most important, then, is that the City's Personnel Department anticipates a significant reduction in the risk of legal exposure by incorporating metadata-mediated, electronic record-keeping functionality into its system design.

As the project has progressed, the structure of record-keeping metadata for HRIS and the definition of specific record-generating transactions have been negotiated by the project's Electronic Records Group (ERG), a task force consisting of representatives from various interested agencies, including the Records and Personnel Departments, the City's IT staff, and the Office of the City Solicitor. The ERG used the University of Pittsburgh's model as a template, modifying it where necessary.

In his article, Mr. Marsden discusses some complicating technical factors in our implementation of a BAC model: 1) encapsulation of the metadata, 2) broadening of the data structure, and 3) establishing an audit trail of subsequent record access even if records are merely viewed. Regarding encapsulation, our project embraced an oxymoronic distributed vision of encapsulation; that is to say, not all of the record-keeping metadata would reside within the electronic record object data structure. This was at the behest of the Personnel Department, and is meant to achieve bit-wise size reduction of the electronic records. Pointers are to be used to link to other electronic components of the record, such as the external audit log of subsequent record use. Similarly, pointers will be used to establish linkages between related electronic records (as opposed to embedding one electronic record object within another). Further, in our environment, it was decided that much of the metadata identified by the University of Pittsburgh's functional requirements project will be created and maintained as hardcopy, not to be incorporated electronically at all.

Regarding Mr. Marsden's view of the technical complications related to a broadening of the data structure well beyond the bounds of off-the-shelf solutions," we are mystified. The metadata encapsulated object (the electronic record itself) exists as a comma-delimited flatfile, nothing more than a sequential string of metadata attributes surrounding the information content of a personnel transaction.

Finally, with respect to Mr. Marsden's last technical complication, that of the audit trail, it should be clarified that what our project intends for HRIS to audit is the subsequent use of the electronic transaction records, not the less-defined "information" contained in the system. None of the project's participants anticipates frequent reason to access the module of HRIS that houses and manages the electronic transaction records themselves. The type of audit trail Mr. Marsden describes will only be generated in certain, very limited instances (e.g., when authorized users query and export electronic records related to specific litigation), and not when an HRIS user asks for a report or an on-screen view of information.

More important than his interpretation of our technical implementation is Mr. Marsden's statement that we intended the electronic records generated by the HRIS to solely provide the context for human resource actions in Philadelphia. The context for human resource-related actions in the City will be provided by a continuum of records, some existing purely in either analog or

digital format, and, in the case of HRIS, in hybrid format. While it is true that the advent of HRIS records will necessitate the development of new agency records schedules, the continued existence of some paper-based records series (such as series containing the sort of records alluded to by Mr. Marsden), plus those electronic records generated by HRIS, will hopefully provide adequate augmentation of Philadelphia's personnel management.

Thank you for providing us the opportunity to correct these misimpressions.

Sincerely,

David M. Weinberg, Deputy Commissioner, Department of Records, City of Philadelphia

Mark D. Giguere, former Electronic Records Manager, Department of Records, City of Philadelphia

David S. Miller, Records Management Analyst, Department of Records, City of Philadelphia

Celia O'Leary, Administrative Services Director, Personnel Department, City of Philadelphia