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## NEW APPROACH TO SYSTEMATIZATION OF DOCUMENTS FOR DETERMINING THEIR RETENTION PERIOD

### Abstract

*At the present stage, due to a wide penetration of information technologies into recordkeeping and archiving processes, there is an actual merging of the stages of operational work with documents in recordkeeping and their preservation as well as storing in the archives. The modern archival storing of documents in most organizations is undergoing a transition from the stage of physical storing of a collection of paper documents (including their physical transfer and storage in the traditional paper archives) to the virtual stage (conducted through online transfer of electronic documents to the cloud storage or virtual archives). In this context, there are new challenges regarding the practice of documents' appraisal and determining their retention period. Methods of registration, systematization and appraisal of documents, which have proven their worth and are widely used for working with paper documents, have become of little use for electronic documents and are subject to revision. It is also actual for the principles of documents' registration in management process, because in modern electronic document management systems (EDMS) the systematization of electronic documents into files takes on a different meaning and requires changes in the principle of their description and appraisal. This paper presents the author's vision on how to modernize the principles of documents' registration as well as determining and fixing their retention period at the stage of recordkeeping, and as a result, to facilitate the process of their appraisal and selection for their transfer to the preservation in the archives.*

*Keywords:* archiving, recordkeeping, appraisal, retention period, disposition.

## NUOVO APPROCCIO ALLA SISTEMATIZZAZIONE DEI DOCUMENTI PER DETERMINARE IL LORO PERIODO DI CONSERVAZIONE

### Sintesi

*Allo stato attuale, a causa di un'ampia penetrazione delle tecnologie informatiche nei processi di registrazione e archiviazione, si verifica una vera e propria fusione delle fasi del lavoro operativo con i documenti in archivio e la loro conservazione nonché conservazione negli archivi. L'archiviazione moderna dei documenti nella maggior parte delle organizzazioni sta attraversando una transizione dalla fase di archiviazione fisica di una raccolta di documenti cartacei (compreso il loro trasferimento fisico e conservazione negli archivi cartacei tradizionali) alla fase virtuale (condotta attraverso il trasferimento online di documenti elettronici al cloud storage o agli archivi virtuali). In questo contesto, ci sono nuove sfide per quanto riguarda la pratica della valutazione dei documenti e la determinazione del loro periodo di conservazione. I metodi di registrazione, sistematizzazione e valutazione dei documenti, che hanno dimostrato il*

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*loro valore e sono ampiamente utilizzati per lavorare con i documenti cartacei, sono diventati di scarsa utilità per i documenti elettronici e sono soggetti a revisione. Vale anche per i principi di registrazione dei documenti nel processo di gestione, perché nei moderni sistemi elettronici di gestione dei documenti (EDMS) la sistematizzazione dei documenti elettronici in file assume un significato diverso e richiede modifiche al principio della loro descrizione e valutazione. Questo articolo presenta la visione dell'autore su come modernizzare i principi di registrazione dei documenti, nonché determinare e fissare il loro periodo di conservazione nella fase di conservazione dei registri e, di conseguenza, facilitare il processo di valutazione e selezione per il loro trasferimento al conservazione negli archivi.*

*Parole chiave: archiviazione, tenuta dei registri, valutazione, periodo di conservazione, scarto.*

## **NOV PRIŠTUP K SISTEMATIZACIJI DOKUMENTOV ZA DOLOČANJE ROKA HRANE**

### **Povzetek**

*V današnji fazi zaradi širokega prodora informacijskih tehnologij v dokumentologijo in arhivske procese prihaja do dejanskega združevanja faz operativnega dela z dokumenti v evidenci in njihovem ohranjanju ter hrambi v arhivu. Sodobna arhivska hramba dokumentov v večini organizacij doživlja prehod iz faze fizične hrambe papirnih dokumentov (vključno z njihovim fizičnim prenosom in hrambo v tradicionalnih papirnatih arhivih) v virtualno fazo (izvaja se s spletnim prenosom elektronskih dokumentov v shrambo v oblaku ali virtualne arhive). V tem kontekstu se pojavljajo novi izzivi glede prakse vrednotenja dokumentov in določanja rokov njihove hrambe. Metode sistematizacije in vrednotenja dokumentov, ki so se izkazale in se pogosto uporabljajo za delo s papirnimi dokumenti, so postale malo uporabne za elektronske dokumente in so predmet revizij. To velja tudi za načela registracije dokumentov v procesu upravljanja, saj v sodobnih sistemih za upravljanje elektronskih dokumentov (EDMS) sistematizacija elektronskih dokumentov v datoteke dobi drugačen pomen in zahteva spremembe v principu njihovega opisa in vrednotenja. Prispevek predstavlja avtorjevo vizijo o tem, kako posodobiti načela evidentiranja dokumentov ter določanja in določanja njihovega roka hrambe v fazi vođenja evidence ter posledično olajšati proces njihovega vrednotenja in selekcije za prenos v hrambo v arhivu.*

*Ključne besede: arhiviranje, evidenca, vrednotenje, rok hrambe, dispozicija.*

## INTRODUCTION

The issues of registration and systematization of documents created on traditional media including paper, magnetic tapes and film, have been fairly well studied. In most of the developed countries there are recommendations for their registration, accounting, use, appraisal, determination of their retention period, disposition and the rules for their transfer to state and departmental archives have been developed. However, when it comes to electronic documents, especially digital born documents, the situation changes dramatically. In the modern world, work with such documents needs regulation, which cannot be developed without realizing that documents created initially in the electronic form are not electronic analogues of traditional documents. Due to the limited size of this paper we will discuss only managerial documents as the most massive and widely used ones. At the same time, we will consider them both on traditional (paper) and on modern (digital) media. To make it clear which documents are discussed in this paper, I propose to take the following classification scheme as a basis:

- document - a generic concept that includes all types of documents on all media;
- paper document (p-document) - a document created on traditional paper media;
- electronic document (e-document) - a document created or used in the electronic form after transformation (e.g. digitization);
- digital born document (db-document) - an electronic document originally created on a digital medium, used in EDMS systems and transferred to the archive exclusively in this form.

Having been involved in research into terminology (including that of ISO)<sup>2</sup>, for many years, the author is aware of the superficial character of the definitions of these terms (Varlamova et al., 2017; Varlamova et al., 2019), but this approach will make it possible to present our considerations, focusing on the importance of the document type (based on the type of media on which it was created) within different approaches to registration, systematization and appraisal of documents.

## TRADITIONAL APPROACH TO REGISTRATION AND SYSTEMATIZATION OF DOCUMENTS AND ANALYSIS OF THE FEASIBILITY OF ITS APPLICATION TO DIGITAL BORN DOCUMENTS

Basically, all the recommendations regarding paper managerial documents come down to the fact that in the current office work they are registered and stitched into files, in accordance with the organization's File Register, which contains the information on the terms of their retention. After the expiration of the retention period an examination of the documents' value is carried out and the documents of the files are appraised, irrelevant documents that are not subject to retention are extracted, and those that remain are transferred to the archive, for which an inventory of the transfer of these files to the archive is drawn up. Thus, there is a well-developed algorithm for working with p-documents in recordkeeping, based on a number of rules:

<sup>2</sup> All the specifics of understanding the ISO terminology used in document and archive management are reflected in specialized English-Russian dictionaries:

- Varlamova L.V., Bayn L.S. & Bastrikova K.A. (2017) *Records Management: English-Russian Annotated Dictionary of Standardized Terminology*. Moscow, RF. 397 pp.
- Varlamova L.V., Bayn L.S. & Bastrikova K.A. (2019) *Records and Archives Management: English-Russian Dictionary of Standardized Terminology*. Moscow, RF. 513 pp.

1. Organizing the p-documents into files with the aim of streamlining them in recordkeeping and facilitating their search. At the same time, p-documents of the same type (or subtype) are formed into files (for example, orders or correspondence) so as to systematize them, facilitate their search by means of consecutive numbering of p-documents within each file.
2. Files are assigned numbers from the organization's File Register in order to assign each file to a particular structural unit of the organization in which these p-documents are created or used (executed). For p-documents, the file is also a way to ensure their safety due to the dense, light-impermeable cover.
3. The retention periods for files are taken from a special retention and disposition schedule of p-documents that sets the retention periods for the purpose of establishing the optimal retention time for files. In this case, the retention periods are assigned to the file as a whole, and not to each document separately.

This algorithm of procedures is regulated by a number of normative acts that are typical for all organizations<sup>3</sup>.

These normative acts are developed by each organization independently on the basis of a number of State normative documents (acts) that are binding on government structures and, as a rule, are used by commercial organizations as well (Federal Archival Agency of Russian Federation & VNIIDAD, 2020, 2019, 2018, 2009, 2005)<sup>4</sup>.

All these regulations, initially focused on working with paper managerial documents, are in the process of being adapted to work with electronic managerial documents. This approach is based on the principle that a document remains as such regardless of its medium (paper or electronic). Not trying to reject this principle and bearing in mind that the idea of creating and saving a document really does not depend on what medium it was created on, we will nevertheless try to consider the reasons why it is not always advisable to apply traditional and well-proven methods of systematizing, registration, disposition and appraisal of p-documents to their electronic counterparts even at the level of recordkeeping.

When the documents arrive at the archive, there, in fact, the connection between the elements of the unified documentation fund of the organization is broken, because the documents are divided into archival (transferred to the archive) and operational (remaining in the recordkeeping). This is due to the fact that the archive compiles its own

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<sup>3</sup> They are:

- Instructions for the Organization's Recordkeeping, regulating the procedure for the creation and use of documents;
- the organization's File Register, the reflecting the structure of the organization and regulating the belonging of the files to a certain structural unit, as well as the retention periods of the files;
- the State Retention Schedule of Documents (typical and departmental), indicating their retention period;
- the procedures (instructions) for the appraisal of documents and the transfer of files to the archive of the organization or departmental archive.

<sup>4</sup> Among them are:

- Rules of Recordkeeping in State Bodies, Local Authorities and Government Organizations;
- Standard Instructions for Recordkeeping for Federal Executive Bodies;
- Methodological Recommendations for Drawing up Instructions for Recordkeeping in Federal Executive Bodies;
- Methodological Recommendations for the Development of File Register Templates;
- Schedule of Typical Archival Managerial Documents Generated in the Course of the Activities of State Bodies, Local Authorities and Organizations, Determining their Retention Period;
- Rules for the Organization of Storage, Acquisition, Accounting and Use of Documents from the Archive Fond of the Russian Federation and of other Archival Documents in State Bodies, Local Authorities and Organizations, etc.

recording documents and assigns a new archival index to the files, which does not coincide with the organization's File Register.

As regards the efficiency of organizing document flow (hereinafter the docflow) and archival storage, these approaches are mostly correct, since they make it possible to filter out unnecessary documents or their copies, form the archival fond of the organization and minimize the composition of preserved p-documents. All this allows reducing the cost of documents' storage and ensuring their safety (both physical and informational).

This is also justified in terms of the convenience of creating and using registration forms, since it is impossible to create universal forms convenient for use in recordkeeping and archives because of the specifics of p-documents and the established archival practice of registration/accounting and systematization of the documents' fond over the years. This process also has some weak points due to the possibility of bias in the appraisal and that of a possible "accidental" destruction of certain documents without leaving traces about who and why did it, as the shelf life of value expertise certificates is relatively short.

It is really possible to destroy the necessary documents accidentally if their retention period has expired (according to the File Register) and it is almost impossible to check the repeatability of the information contained in them because of the volume of paper docflow and the multiformity of its registration forms. It is impossible to determine the retention period for each p-document due to the specifics of the system of retention and disposition schedule (typical and departmental), which, as a rule, contain standard types (subtypes) of documents and require special knowledge.

Therefore, the questions to consider are:

1. Are all the aspects and methods of the tradition of paper recordkeeping and archival storage fully applicable when working with db- documents?
2. Is it possible to keep a single and indivisible documentary fond of an organization with uniform rules for db-documents' registration and systematization?
3. Is it possible to do without forming files and to base the registration system solely on db-documents?
4. Is the retention and disposition schedule of typical documents with the indication of their retention period sufficient at the present stage, or should they be transformed for db-documents?
5. Is there any difference in the appraisal between paper and db-documents?

We will try to answer these and other questions in this paper.

Based on the foregoing, we can see that the systematization of documents both in recordkeeping and in archives involves organization of files. By assigning a registration number to a p-document (usually sequence number, increasing throughout the year), the recordkeeper inserts into it the index of the file this document will relate to. The file index is taken from the organization's File Register, closely related to the structure of the organization. Thus, initially the document is placed in a file for the purpose of accounting and facilitating its search.

Thus, not having electronic means of information retrieval and maintaining a paper-based way of registering documents, such a detailed system of registration number (index) of an incoming documents made it possible to quickly find it manually by flipping through the register of incoming documents, having minimal information about it (for example, knowing where it came from). At the same time, this approach was not always convenient if the work on the received p-documents required the involvement of several structural divisions of the organization, and the question arose in which of them the

original of this p-documents should be stored. In most cases, the original of the p-documents remained in the administrative department, and its copies were transferred to all the chiefs of structural divisions of the organization, indicated in the resolution. Thus, the volume of paper docflow increased significantly. Of course, during the appraisal of the p-documents transferred to the archive these copies were deleted, but the availability of the original was not always checked, and in the case of the organization with poorly organized recordkeeping there was a risk of losing the original document.

Within any electronic documents management system (hereinafter the EDMS), e-document are also recorded by the registration number of the document, the only difference is that, due to the capabilities of modern EDMS, an e-document can be searched for by its content or keywords, and there is no need for such a detailed elaboration of the registration number. Moreover, with a well-developed system for identifying incoming documents, the formation of an incoming number and filling in a document's card occurs automatically due to the fact that the entire complex of classifiers is initially included in the EDMS.

At the same time, the problem of copying the documents has also been resolved, since any authorized person can have access to the e-documents, and the original of the e-documents is stored in the system a priori, if the organization uses exclusively electronic docflow.

Thus, speaking about electronic managerial documents, we can see that at the level of their registration, the established practice of working with their paper analogs seems redundant and should be simplified in terms of the formation of an incoming (as well as outgoing) registration number, one of the functions of which was to attach the db-documents to a particular file.

However, we can observe a tendency to keep the systematization of db-documents into files, even when using the EDMS. But how appropriate is it?

In the EDMS, registration of db-documents (incoming, outgoing, internal) is done individually, i.e. each db-document is assigned a unique identifier (registration number, index), which the db-document retains throughout its entire life cycle in recordkeeping and which can be saved when transferring these db-documents to archival storage. Due to the fact that all EDMSs regularly (daily, weekly, monthly, annually) form registration lists (register) of el-documents (separately for incoming, outgoing and internal), it turns out that when conducting an appraisal of db-documents in these registration forms, necessary data can be entered: the decision to destroy the db-document or transfer it to the archive; information about appraisal; number of the archival inventory in which the db-documents is included; the archival index of the db-documents (if it is necessary to maintain a special registration form), etc.

Thus, it will be possible to preserve a unified documentary fond of the organization with uniform rules for db-documents' accounting and their traceability at all stages of their life cycle, including archival storage. This approach will also allow us to exclude the practice of arranging db-documents into files, which, in our opinion, is redundant in relation to electronic document management due to the following:

1. Managerial documents are arranged into files according to the principle of uniformity. Even in the paper docflow this is not always convenient. The fact is that in the course of execution of a managerial document, a whole complex of related documents is formed, which are distributed into other files or form a separate file. But in either case, the integrity of the documentary fixation of the process of execution of a managerial document is disturbed. In the conditions of electronic docflow this can be avoided, because the e-document in the EDMS is virtual and is literally "collected" at

the user's request. Therefore, the creation of files seems to be rather an artificial and unnecessary activity, since it is possible to make a basing on the user's request according to specified parameters. Since these requests may be different and the volume of the requested db-documents will be different as well, there is no need to create any files at all, since they can contain the documents' duplicates (copies). This happens quite often in paper docflow and makes it difficult to carry out an appraisal.

2. The practice of creating a file of documents requires the development of special registration forms for files. In paper recordkeeping this function is partly performed by the File Register, and when they (documents) are transferred to the archive, by the inventories. When maintaining documents in recordkeeping and their continuity in the archive, the need to create special register forms for files disappears. The only exception are files of special purpose: legal cases, investment cases, etc., i.e. cases requiring legal certification of their completeness and their containing all necessary documents. But as a rule, in Russia, they are made on paper or in mixed form (hybrid files), due to imperfect technology and legislation.
3. When creating files within any managerial process, the documents included into them have different retention periods. In this case, the file in the File Register is assigned a maximum retention period based on the documents in the file. Thus, a file may contain documents with expired retention periods, as it is impossible to reorganize the files in recordkeeping. In case of db-documents' registration this problem will be solved as well, since the retention period will be assigned to specific db-documents, and not to the file as a whole.

Here we have come to a very important point – appraisal and determining the db-documents' retention period.

## **THE TRADITIONAL APPROACH TO THE APPRAISAL AND DETERMINING THE RETENTION PERIOD OF DOCUMENTS AND THE WAYS OF THEIR TRANSFORMATION**

In Russia as well as in many other countries the retention periods for documents are specified in the retention schedule generated according to documentation systems. For example, in Russia the "Schedule of Typical Archival Managerial Documents Generated in the Course of the Activities of State Bodies, Local Authorities and Organizations, Determining their Retention Period" (2020)<sup>5</sup> (hereinafter the Retention Schedule) is the most demanded State typical retention and disposition schedule which contains the retention periods of the most common types and subtypes of managerial documents, combined into standard groups.

This Retention Schedule has a ranking structure, because the retention period of the document of the primary organization that is not included in the schedule of organizations - contributors to the State Archival Fond (for example, orders) will usually be lower than the retention period of a similar document of a higher organization, which is a contributor to the Archival Fond of the Russian Federation.

Therefore, the same type of documents can have different retention periods, depending on the organization in which this document was created. Besides, the retention period is assigned not to a specific document, but to the type or subtype of documents, in close connection with the documentation system in which it is formed.

At the same time, practically all government agencies (i.e. ministries) have their own Departmental Retention Schedules of documents specifying their retention periods,

<sup>5</sup> This Retention Schedule was created in the USSR and is regularly updated in modern Russia.



because special documentation systems are created there. For example, the Ministry of Justice has the legal documentation system, Ministry of Taxes and Duties has the tax documentation system, etc. As a rule, retention periods are indicated in their schedules in relation to a specific type or subtype of documents that are formed within the implementation of a specific function. In both cases, the type of document is an universal, but its subtypes are different, as well as their retention periods.

Thus, the appraisal and retention periods are determined by the organization on the basis of the retention and disposition schedules and can be related both to the standard type of document and to its particular subtype. Therefore, documents arranged in the file may have different retention periods. When arranging p-documents into file, this problem is obvious and creates additional inconveniences when carrying out an appraisal and organizing the storage of documents.

When conducting electronic docflow, this situation can be changed by setting the retention period for each type and subtype of e-documents separately and while entering these documents into the system, taking into account the requirements of the regulatory framework. Technically, this is not difficult, since it requires only an additional area in the EDMS registration form. The problem arises while determining the retention period for a specific db-documents, because in the Retention Schedules the types and subtypes of p-documents are grouped into clauses, formed according to the principle of belonging to the function either of management or of production, and within it according to the type of documents. Thus, in order to relate the shelf life to a specific type (subtype) of document, it is necessary to be expert in the documentation systems, management and/or production processes implemented within the activities of the entire organization.

Another option is to use alphabetical indexes of the types and subtypes of documents included in the Retention Schedule. But in both of these cases, we will not find at least 25% of the types of e-documents, since with the introduction of IT the document management process has been substantially simplified and it is often easier to create a new form of db-document (i.e. increase the number of its subtypes) so as to solve a specific managerial or production problem rather than use the available ones for a number of reasons. In fact, not all organizations keep holders with unified forms of their documents (even managerial) in principle and have their templates in the digital form or just units in XML formats. That is why it is easier to develop a new form for a specific task, but as a rule, few people care about what file to put the documents into and what retention period it should be assigned.

All these considerations led the author to the idea of the need to change the very approach to registration and systematization of db-documents and to give up the practice of arranging them into files, at the same time, gradually reducing the practice of developing retention and disposition schedule of documents with an indication of their retention period, since they are only effective for p-documents.

The outcome could be the "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" (hereinafter the Register), created as a State Information System. It should be noted that the idea of the Register was presented by a team of authors (Afanasyeva L. P., Muravyova N. A., etc.) under the leadership of the paper's author (as the vice-director of VNIIDAD and the head of the theme) within the framework of topic of the VNIIDAD's Research Plan in 2019, but has not been implemented yet at the state level<sup>6</sup>.

6 VNIIDAD (2019) *The Concept of the Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period*. Moscow, RF: <https://vniidad.ru/wp-content/uploads/2021/02/План%20НИОКР%20на%202019.pdf>



At the same time, the analogue of the Register was introduced by the author in a number of large Russian commercial companies with a ramified structure that are not compilers of the Archival Fond of RF (which made it possible to give up the practice of forming documents into files, having developed our own schemes for classifying documents, assessing them and determining their retention period) and has shown its effectiveness. However, the completeness of the functionality of the Register can be realized only in the context of its implementation as a State Information System.

## A NEW APPROACH TO SYSTEMATIZING AND APPRAISAL OF DB-DOCUMENTS FOR FIXING THEIR RETENTION PERIODS

Any state information system is necessary for the implementation of the functions of the authorities (state bodies, federal executive bodies), as well as for organizing the exchange of data both between state bodies themselves, and between the latter and non-state organizations, on issues within the competence of the former.

In order to realize this idea, it must be divided into components and start with managerial documentation systems as the most widespread and still the most unified ones owing to extensive scientific and practical developments of Main Archival Administration and VNIIDAD (1971–1973, 1991) made during the USSR period<sup>7</sup>. Although the author relies on the experience of Russia and focuses on national practice, this idea might be useful to other countries as well, because it is universal. At the same time, the idea should be implemented simultaneously in all structures (starting with the higher bodies, federal executive bodies) to ensure the continuity of forms of documents' types and subtypes, administration procedures and consistency of the EDMS classifiers of organizations participating in the Register.

When the State Information System "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" is created, the participating authorities (state bodies, federal executive bodies) will have to:

- conduct an audit of the documentation systems used in government bodies and identify all types (subtypes) of documents used by the latter at present;
- identify by which regulatory enactments these types (subtypes) of documents were introduced and within which business process as well as in what formats they are used;
- create a list of normative acts that introduced the forms of documents for special documentation systems (medical, tax, customs, etc.) that are not presented in the retention and disposition schedule (typical and departmental);
- compare the selected types (subtypes) of documents with each other, unify them (reducing their quantity and improving their quality) and recommend the formats for their creation-use-preservation;
- create a unified classifier of types (subtypes) of documents for each of the documentation systems and apply it in EDMSs used in government bodies;
- develop (update) the forms in XML for each type (subtype) of the document;
- establish (specify) and fix the retention period for each type (subtype) of the document;

<sup>7</sup> There are:

- Council of Ministers of the USSR, Main Archival Administration/VNIIDAD, GOSSTANDARD (1971–1973). *Unified State Recordkeeping System*. Moscow, USSR: Publishing House of Standards.
- Main Archival Administration of the USSR & VNIIDAD (1991). *State System of Documentation Support of Management (Basic Provisions and General Requirements for Services of Documentation Support of Management)*. Moscow, USSR: Publishing House of Standards.

- modernize the practice of coordinating the retention period of newly formed types (subtypes) of documents with the government body responsible for archiving;
- systematize the practice of creating new types (subtypes) of documents by government bodies and take control of the former by including newly formed types (subtypes) of documents in the Register.

The State Information System "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" could greatly simplify the work of commercial organizations, which would allow using the Register as a paid state information resource for a number of parameters:

- a database of types and subtypes of documents' form will facilitate the search for the required form and minimize the process of creating new varieties of documents, because it will optimize the process of documents' creation;
- a database of formats, their electronic templates and XML-schemas of documents will make redundant the work on their development and approval, because it will allow using ready-made forms;
- a database on the retention periods of types and subtypes of documents will facilitate the search for these periods and lead to the fulfillment of state requirements for the formation of File Registers of organizations (if these requirements are still actual) and the preservation of the organization's documentary fond.

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## SUMMARY

The issues of registration and systematization of types and subtypes of digital born documents (db-documents), as well as the methodology for appraisal and determining their retention period, are of fundamental importance for the preservation of the organization's documentary fond and, as a consequence, of the historical heritage of the state and society. The methodology of these processes, well developed and successfully used for decades to produce paper documents (p-documents), is not always suitable for electronic documents, especially those digital born.

The author proposes a new approach to the processes of accounting, systematization, appraisal and determination of the retention periods of these documents, based on the scientific theme the Concept of the "Register of Types and Subtypes of Documents Formed in State Bodies and Determining of their Retention Period" (hereinafter the Register) which was developed under her supervision in VNIIDAD (2019). Nevertheless, it was implemented by the author as a private project at one of the largest commercial enterprises and has shown its effectiveness and feasibility. This experience allows the author to hope that over the time the Register, introduced at the state level, will:

- change the approach to both the registration and systematization of db-documents in the EDMS, making the creation of files a rare process;
- make the organizations' file register an accessory (and sometimes unnecessary) db-document, since it will allow the development of detailed and consistent classifiers of types and subtypes of db-documents easily used in the EDMS;
- reduce the role of (and perhaps cancel the need for) the retention and disposition schedule of db-documents with an indication of their retention period, since the Register data will always be more updated and relevant;
- lead to a change in the practice of appraisal of documents and to a rise in the responsibility of officials for the disposal of db-documents, as that will make it possible to record in registration forms all the arguments for making this decision, as well as to save metadata about the destroyed document.

In this case, the registration number (index) of the db-document assigned to it when it is included into the EDMS (or created in it) will be saved throughout its entire life cycle and will be transferred to the archive of the organization and/or to the departmental archive, which will preserve the continuity of the processes of working with db-docu-

*ments, a single scheme of its metadata and as a result, it will preserve the consistency of accounting for the organization's documentary fond (operational and archival).*

*Thus, realizing that db-documents are a different entity, and not just a different form of documents' creation, we are on the verge of dramatic changes in their registration, accounting, systematization, appraisal and determination of their retention period, requiring a new methodology and theoretical reconsideration of many familiar processes, so thoroughly elaborated for p-documents.*

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