WHITEPAPER

# BUILDING A MODERN RECORDS AND INFORMATION PROGRAM

## Records information management (RIM) is more complex than ever before.

There are a lot of interrelated moving parts that touch all areas of your business. The number of digital records has exploded, and new regulatory requirements seem to occur on an annual basis. As customer expectations have heightened, the speed of doing business has accelerated—and every minute spent searching for a record is a minute of productivity lost.

Rolling out a comprehensive RIM program will take understanding by the entire organization, plus careful planning by an information management team, to be truly successful.

### THREE STEPS TO BUILDING A SUCCESSFUL RIM PROGRAM

1. **STEP ONE:** Develop a strategic records management plan
2. **STEP TWO:** Conduct a status check
3. **STEP THREE:** Develop the implementation plan

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## Step One: Develop a Strategic Records Management Plan

Your program's strategic or master plan should clearly define what the records management program will look like and how it will be rolled out. Begin by developing a plan that lays out where your RIM program stands now and where you want it to go. The plan must be something that your organization's management team can understand and buy into.

### Strategic plan components

To create a comprehensive plan, there are some very distinct components it should have. Answering the following questions will help you develop each component:

1. **Context:** What is our current state? How did we get here? What are the driving forces behind having a records program?

The context section of the strategic plan should provide background on current records practices and an overview of any previous gap analysis. This section should also identify the drivers behind why the program isn't just a "nice to have." These can include regulatory requirements or identification of past trouble points that would be corrected by putting a program in place.

2. **Consultation:** How do we engage the organization to ensure that staff who need the program will back our plan?

#### IS THE C-SUITE ON BOARD?

Prep senior executives with a strong—but not necessarily long—Information Management 101 presentation. Include:

- Why a RIM program is important
- Basic requirements of the program
- Risk mitigation, regulatory compliance and defensibility
- Staff time investment

**Make sure to reassure the C-suite that their support will minimize operational disruptions.**

Consultation is vital to engage the organization in the records plan development process. For any company-wide initiative to succeed, all staff must have an opportunity to contribute to its development. When staff are bogged down in daily tasks, customer-facing activities and putting out fires, new procedures can easily fall by the wayside before they ever turn into routine practices. To build a RIM program that your employees will embrace, you must:

- *Collect feedback:* Engage departments across your organization to learn about the types of records they manage or produce, their current record management practices and their technology wish list for improving procedures and workload.
- *Build a committee:* Create an information governance board with representatives from each department to provide input on new procedures and training needs, bring up issues as they arise and drive adoption of the program among their staff.
- *Find a partner to help:* Research partners, not just vendors, who can assist with building and automation to ease the work burden and ensure the consistent application of metadata to each record. Include lifecycle dates so that records are marked for destruction when the retention term expires with no human intervention necessary.

3. **Challenges:** What are the challenges we face rolling out a records program? How do we intend to address each challenge we identify?

Be realistic in your goals. For example, if the challenge is integration of your software with an electronic document and records management system, discuss the goals of identifying all electronic record storage systems, integrating those systems with new RIM software and creating alternative solutions for complying with record retention requirements when integration is not possible.

**4. Vision:** What will records management in the organization look like once the program is fully rolled out?

A vision statement demonstrates that you have considered the big picture of the program and its value to the organization. For example, you might have the following vision statement:

*[The organization] will have a compliant, effective and efficient records and information management program.*

Expand on this statement with bullet points for clarification, for example:

- *The records program will provide a high degree of information usability for staff.*
- *The program will allow information to flow seamlessly within the organization with only necessary protective borders.*

Related to the vision statement are the program's guiding principles. Expand on the principles with action words describing how the program will operate; for example: responsive, accurate, consistent, flexible, innovative, collaborative, safe.

**5. Program Execution:** What will the services and products of the program include? How will they be delivered?

Reviewing program execution will set out expectations for what services and products you intend to provide and how they will be provided. Depending on your organizational needs, you may want to offer services such as a records management helpdesk or an information access and protection advisory service. Clearly define what each service will include.

**6. Implementation:** What are the stages of implementation? When and how will each stage be executed?

Once products and services are outlined, define the phases for implementing services and governance products. You might include:

- *Baseline Phase:* applying RM to record holdings and introducing Electronic Discovery Reference Model software (EDRMS)
- *Advanced Electronic Integration Phase:* developing solutions to implement retention requirements for systems that could not be linked to the EDRMS
- *Perimeter Component Completion Phase:* addressing the low-impact records issues that could not be completed during the previous phases

A **communication plan** is a key component of change management and must be included in implementation. Without such a plan, the chances of program success are severely reduced. Your various audiences have different needs when it comes to being informed, and your communication plan must address all those needs and how you are going to meet them. Remember that change scares a lot of people, so develop your communications to identify the upcoming changes and demonstrate how any challenges will be overcome.

Rounding out your strategic plan will be sections such as an overview, glossary of terms and any appendices in support of the plan. Make sure the plan covers all components of the records lifecycle as well as the various media types and records formats that your organization controls.

## Step Two: Conduct a Status Check

In Step One you developed a strategic records management plan that builds the vision of what the program should look like when fully implemented.

Now it's time to conduct a status check to understand current records management practices throughout the organization. The status check will determine the starting point for each part of your implementation plan, Step Three in building a records management program.

### How to conduct a status check

The "how" of conducting a status check includes a number of steps.

#### 1. Formulate status investigation questions

Knowing the end objectives expressed in the strategic plan, you can decide what is most important to understand about the current status of the company's record practices. With this information you will be able to construct your status investigation questions. If, for example, a desired outcome is to have a standardized naming convention, you'll want to include questions about current naming practices for files and folders. By documents this information, you will be able to include steps in the implementation plan that will take you from current practices to your desired final outcome.

To assist in question development, you may need to reference any standards that you used in developing the strategic plan. The standards, which lay out industry best practices, will serve as a guide to framing questions. Some industry standards, such as the Generally Accepted Record-keeping Principles, may have companion documents like the Maturity Model, and these may be integrated with predesigned self-assessment documents. Even if the included questions don't fit your needs exactly, a prebuilt assessment could give you great ideas for questions you should be investigating.

#### 2. Choose a data collection tool

Once you've established what information you want to gather, you have to decide how to gather it. Should you use an online survey tool, conduct one-on-one or group interviews, develop a self-assessment tool or use an existing assessment? Surveys can be somewhat difficult to use for collecting a wide variety of information as the survey tends to be extremely lengthy. In addition, potential respondents can easily ignore a survey. Similarly, distributed self-assessments can be long and easily ignored. And, in both cases, you may need to supply explanations to terms used in the survey or assessment.

In-person or phone interviews, on the other hand, are highly effective tools for collecting information. A scripted approach will keep interviews focused while the in-person interaction allows the interviewer to pick up on respondent cues that will drive further questions. At the same time, if an interviewee doesn't understand a term, there is an immediate opportunity to clarify. And, unlike the surveys and assessments, a meeting invite is a lot harder to ignore!

To focus the interview flow and improve later readability, organize your questions by related topic. For example, group questions about software, passwords and other IT-related questions together.

The most effective interview execution is often a two-person team, with one team member doing the questioning while the other is taking the notes.

#### 3. Design a data recording method

Regardless of the collection method, you will also need to design a collection recording document, likely a spreadsheet, that you will use in the developing the implementation plan. Include the following columns in your spreadsheet:

- *Requirement:* your desired outcome
- *Current Status:* what the interviewee's business unit is currently doing in light of the requirement

- *Condition Measure* (optional): short-version identification of the status for that requirement (0 = not met, 1 = partially met, 2 = fully met)
- *Recommendation:* mitigation actions recommended to bring the status to fully met. This column will be used to develop the implementation plan.

**A clear and concise status check is essential for a well-informed implementation plan, so be thorough in your process.**

## PROTECTING YOUR ORGANIZATION THROUGH LIFECYCLE MANAGEMENT

Don't compartmentalize records management—instead view it as a sequence or process that will increase access and efficiency while mitigating risk and improving overall compliance. To make sure your RIM program will support proper handling, formatting and destruction of both hardcopy and digital information, include lifecycle management questions as part of your status check. There are five lifecycle stages.

### Lifecycle Stage 1: Hardcopy

Strong hardcopy programs use off-site storage where material is stored within a highly secure, environmentally controlled location.

### Lifecycle Stage 2: Information governance

Information governance allows organizations to harness data and properly identify compliance schedules. Retention planning and implementation allow you to control costs as well as managing inventory levels and limiting exposure to risk of discovery.

### Lifecycle Stage 3: Secure shredding

Secure shredding allows you to properly eliminate files that contain critical personal, financial, medical or legal information. Office shredders have low adoption rates and are subject to significant risk. Secure shred bins or consoles, rotated on a constant basis, are easier to use and have higher adoption rates. Bins are securely locked and their contents properly destroyed at a professional location.

### Lifecycle Stage 4: Digital conversion

Converting hardcopy records to digital formats improves efficiency. Digital records are also less susceptible to risk. The files are easily accessible from a cloud-based storage database.

### Lifecycle Stage 5: Secure destruction

Unlike the shredding of individual files, secure destruction is a process by which cartons of files are destroyed on a scheduled basis. The destruction of material is essential to a complete RIM program and should be completed by a professional organization that provides certificates of destruction.

## Questions to include in a status check

You may feel that your organization is doing an adequate job managing records and information. But as you conduct your status check and begin probe a little deeper, you may find that there's a lot your company doesn't know about how your records are being handled.

Inconsistent policy enforcement, records held beyond their retention term and unsecured customer data can make it difficult to defend against litigation and lead to regulatory fines. Records may be held in unsecured facilities or storage rooms, hard to locate and susceptible to damage by flood, fire or other disaster.

To gauge the effectiveness of your organization's RIM program in mitigating risk, be sure to include the following questions in your status check.

### Who's in charge?

With the growing importance of information governance, the person responsible for your RIM program needs the authority to create and update policies and—even more important—enforce them effectively. An administrator or low-level manager is unlikely to fulfill this role with much chance of success. The same goes for outsourced mailroom functions. Your organization needs someone who can navigate among compliance, IT and other functions concerned with information governance. This might be a director of records information management or even a chief information governance officer (CIGO).

### How effective is enforcement?

Best-in-class records management incorporates automation to handle day-to-day tasks such as assigning document-level metadata to track and retrieve individual documents and monitor their lifecycle to comply with individual retention schedules. Documents that have reached the end of their retention schedule should be destroyed in a consistent and secure manner to ensure that the program will remain legally defensible.

### How do you handle legal holds and audits?

The two greatest areas of risk are litigation and regulation. In addition to facilitating consistent policy enforcement, your records management system should be able to track and release multiple legal holds at the document level. It should also generate an audit trail for each record, including every access and action taken on it.

There are many more aspects to a successful program, including ongoing monitoring and improvement, disaster-recovery planning and data security.

### YOUR DOCUMENT MANAGEMENT STYLE

To get an idea of the steps you should take to protect your organization against risk, take this quiz on "What's Your Document Management Style?"

## Step Three: Develop the Implementation Plan

Now that you have developed a strategic plan and completed a status check, you have a picture of where you want to go and where your program is currently. Step Three, the implementation plan, is the "how to" link from your current to your desired future state.

The development of the implementation plan is as involved as the actual implementation activities themselves. Your organization is making a long-term commitment that cannot be completed in a month or two. A phased approach is meant to take between one and two years just for Phase I.

### Governance documents

The implementation plan responds directly to the gap between Step One, the strategic plan, and Step Two, the status check. For example, if your desired outcome is to have a full suite of governance documents—policies, procedures, guidelines, standards—and your status check finds that you only have an old and possibly outdated policy, then the next obvious step is start drafting the necessary documents. You must decide which governance documents you truly need and draft them to support the goals of the strategic plan. Take into account that the governance documents will probably go through many versions before final publication.

### GOVERNANCE DOCUMENTS MAY INCLUDE:

- Records Management/ Information Governance team position descriptions
- Records Management Policy
- Legal Hold Policy
- Record Creation/ Receipt Standard
- Retention Schedule Maintenance Procedure
- Information Distribution Standard
- Information Protection/ Security Standard, Naming Convention Standard
- Imaging/Scanning Standard
- Information Integrity/ Reliability Standard
- Records Disposition Procedure

## OTHER IMPLEMENTATION PLAN COMPONENTS

There are many other components of a successful implementation plan that you will need to address, including:

- Development of a taxonomy, if not created in conjunction with your retention schedule
- Physical records/box storage, which may include the use of contracted services
- Cleanup of shared drives and mobile storage
- Introduction of an enterprise content management (ECM) system
- Establishment of a shredding program
- Establishment of a records management help desk
- Establishment of the disposition process
- Alignment with company privacy and compliance programs
- Alignment with information technology processes and systems that affect documents and records management
- Establishment of corporate archives or alignment with an existing archives team
- Establishment of an education and training program for both introduction and ongoing program management

Your list of program components will vary based on your business needs.

The implementation plan will also change based on the implementation phase. Phase I is often considered a baseline implementation. Depending on the resources you have, both internal and external, you will have to plan accordingly. With that said, a small team of three-to-five active members can have a huge impact in a single calendar year.

Within your plan, here are some suggested areas to prepare for:

### 1. Develop initial governance documents

These draft documents will serve as a guide to implementation activities. Remember that governance documents are likely to change as you move through implementation.

### 2. Establish your records management/information governance services

Be prepared to inform your end users how you will provide assistance. Let them know about advisory services and expertise regarding filing supplies and storage equipment, development of procedures and guidelines, support during the disposition of records, support for conversion of records from hard copy to digital formats, support in developing localized taxonomies and any other services your organization may need to fulfill the strategic plan.

### 3. Meet with business unit (BU) heads, and complete your unit questionnaire

Design an information-gathering questionnaire that will address issues around record locations, security, staff availability and other key areas the implementation project will touch.

### 4. Host individual BU pre-implementation Q&A meetings and provide software demos if applicable

This part of the process will ease concerns of end users as they get to ask questions about the impact of RIM on their daily lives.

### 5. Interview BU staff

Using a scripted set of questions, interview key BU staff.

### 6. Evaluate BU status

This evaluation will help determine records to be affected, provide a guide regarding physical holdings, define access limitations, identify any litigation impacts and assist in determining how to minimize work disruptions.

### 7. Evaluate resource availability

Estimate time commitments for staff. Discuss the estimates with each BU lead to determine which resources are readily available. This is a hinge-point for the implementation as further action depends on whether resources are available—or not.

### 8. Adjust for unavailable resources

If any key team members are not available to implement the rollout, then consider other options, such as adjusting dates or hiring temporary staff or contractors.

### 9. Conduct training

Training plays an essential role in your implementation. Provide a RIM 101 type of course that introduces the taxonomy or classification scheme and its use, and reviews the naming convention and record disposition process. Cover key governance standards that will inform end users of their responsibilities. Present the help that is available from the records team. If an ECM is introduced, run additional end-user training dedicated to the software.

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#### ONLINE TRAINING

For online training, keep the sessions short—three-to-five minutes if possible—and break them down into components that align with your program execution. Include both technical "how to" sessions and compliance sessions where the staff can acknowledge that they have reviewed the policy and will comply with the requirements.

As much as possible, provide in-person training sessions, or at least interactive live webinars. There's nothing quite like being able to ask a live person questions during a learning session and get instant feedback. And finally, don't be afraid to make it fun!

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### 10. Prepare for implementation and legacy record migration

In your strategic plan you should have addressed how a new classification scheme would be applied. Now you need to implement that plan within specific media types. The questions to answer include:

- What should move to the new system?
- Who is going to move it?
- When is it going to be moved?
- How is it going to be moved?

This step would also likely include the installation, or push, of the ECM.

### 11. Conduct a post-implementation review

This is an opportunity for impacted BU staff to discuss concerns or simply provide feedback about the process and the software itself. This is also when a deficiencies list will be created.

### 12. Complete deficiencies follow-up

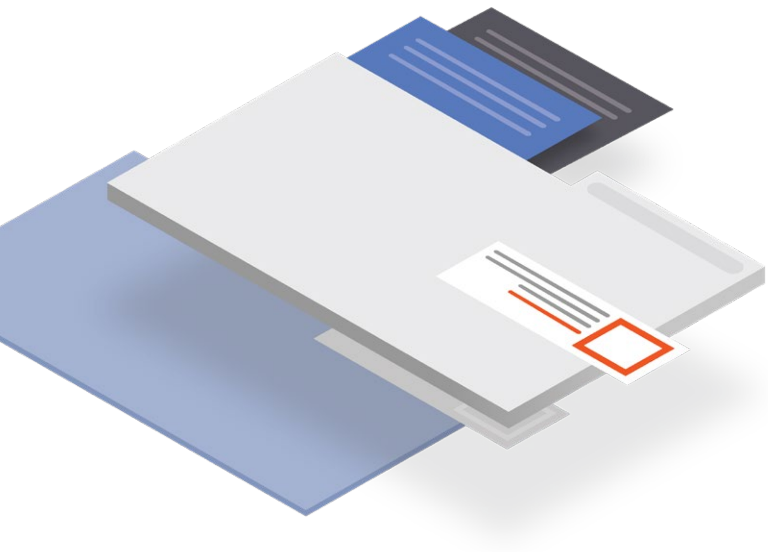
Deficiencies will be assigned to the appropriate project team member, and all tasks will be reported to the project leader when completed.

### 13. Report to the sponsor or steering committee

Continuous support is required for such projects. Progress reviews, including successes and areas of improvement required, will go a long way to ensuring support remains constant.

While the areas above may, or may not, fit your program implementation, they should act as a good starting point for developing a complete implementation plan. The balance of the plan will be in the tools needed to complete each area. For example, some of the appendices to the plan will include the BU lead questionnaire, the BU staff interview questionnaire, BU status evaluation outline and the post-implementation interview sheet. Aside from the plan—and as a result of the need to implement it—you will also have to develop your governance documents, training materials and sponsor reporting.

As for actual implementation, a six-month pilot with an initial group that embraces the changes is the ideal way to begin. Work with this group to help sort out issues, building a real partnership with them so that they will be open and up front about their experiences. Let them know that you value their input in making your organization's services and products the best they can be once rolled out organization-wide.



## Execute with efficiency

As you roll out the phased RIM program, remember to constantly inform those affected about the steps that are taking place and allow staff unrestricted access to ask questions and obtain the technical help they need.

It's equally important to provide follow-up training, hold wrap-up sessions and get feedback on how the implementation went and what staff would like for ongoing support. Conduct departmental compliance reviews to reinforce the organization's commitment to the RIM program.

Finally, close the loop with the C-suite and share your learning from the implementation follow-ups. Explain to executives how the learning has affected next-phase rollout plans as well as long-term program support services.

With a phased rollout of a records information management plan designed to demonstrate continuous improvement, the long-term commitment will be more than worth it in terms of organizational efficiency, records security, risk mitigation and regulatory compliance.

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