

# Creating a RIM Program- Best Practices for your Organization

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# We help our clients...

## MANAGE RECORDS AND INFORMATION

### Reduce Risks

**Develop and implement** comprehensive, legally defensible enterprise-wide Records and Information Management Program

### Achieve Compliance

**Effectively manage** records (all media), maintain RIM policies and procedures, implement and audit program components, meet legal and operational retention requirements

### Implement Information Governance

**Sustain** a practical, consistently applied Records Management Program for all employees, contractors, and relevant parties (vendors, agents)

# Bring key players to the table to form a Records Management Steering Committee

## Disparate objectives

### Legal

- Discovery, preservation, and production

### IT

- Manage storage costs
- Integrate systems
- Security issues

### Compliance

- Assurance that all rules and regulations are adhered to
- Privacy issues

### Records Management

- Retention and disposal per policy



# Records and Information Management Best Practice Areas

# Consistency

## CONSISTENCY IS THE KEY TO RECORDS MANAGEMENT

- **Write Records Management Policies and Procedures and apply them consistently.**
- **Develop a single Records Retention Schedule for your organization and implement it consistently across your enterprise.**
- **Formalize records destruction practices and destroy records consistently and systematically.**

# 5 Areas of Focus

Once your executive steering committee members have been identified, focus on these 5 areas:

- **RETENTION**
- **POLICIES & PROCEDURES**
- **ACCESS & INDEXING**
- **COMPLIANCE & ACCOUNTABILITY**
- **DISPOSAL**

# Foundational Records Management Program Components

# Records Management Program Development

## *Core Foundational Elements*

### **Records Classification Scheme**

- Based on extensive industry experience
- Tailored to your organization

### **Records Retention Schedule**

- Supported by Legal Research<sup>1</sup>
- Right Sized
- International legal research<sup>1</sup>

### **Policy and Procedures**

- Should dictate why and how

### **Implementation Tools**

- Training Materials
- Training Sessions
- Intranet site
- eLearning courseware<sup>1</sup>

1- optional add on



# Records Classification Scheme

Use a hierarchical classification scheme consisting of Business Functions, Record Classes, and Record Type examples



# Records Classification Scheme Layout

*Business Function*

Accounting

Records Classification Scheme

Proposed Records Classification Scheme By Business Function

**Components of a Record Class:**

- Record class code
- Record class name
- Record class description
- Record type examples

Record Class	Record Class Name/ Record Class Description
ACC1100	<p><b>Accounts Payable / Accounts Receivable</b></p> <p>Records related to the payment of financial obligations and the receipt of payment from third parties. Payables records verify the purchase of goods and services, the accuracy of the invoice, and authorize payment. Receivables records relate to sales orders and cash receipts of payments received from customers. Includes check requests, vendor invoices, travel expenses, customer invoices, cash receipts, and royalty payments.</p> <p><u>Examples Include:</u></p> <ul style="list-style-type: none"> <li>Accounts Payable Reconciliations</li> <li>Accounts Payable Vouchers</li> <li>Accounts Receivable Reconciliations</li> <li>Billing Files</li> <li>Cash Disbursements</li> <li>Cash Receipts</li> <li>Check Requests</li> <li>Employee Expense Reports</li> <li>Employee Relocation Expenses</li> <li>Expense Receipts</li> <li>Invoices</li> <li>Material Receipts</li> <li>Payables</li> </ul>

# Legal Research Methodology/Overview

- **Comprehensive list of regulatory requirements (State and Federal level)**
- **Legal Research for U.S. and Global locations**
- **Legal Research Elements**
  - Legal citations
  - Legal considerations
  - User-friendly legal indices

# Records Retention Schedule Layout

Legal research should be conducted for U.S. federal and states in which the company operates

Accounting		Records Retention Schedule				
Record Classes By Business Function						
Record Class Code	Record Class Name/ Record Class Description / Record Types	Legal Group	Legal		Retention	
			Requirement	Consideration	Operational	Official
ACC1100	<b>Accounts Payable / Accounts Receivable</b>  Records related to the payment of financial obligations and the receipt of payment from third parties. Payables records verify the purchase of goods and services, the accuracy of the invoice, and authorize payment. Receivables records relate to sales orders and cash receipts of payments received from customers. Includes check requests, vendor invoices, travel expenses, customer invoices, cash receipts, and royalty payments.  Retention Event: The retention period begins the date the record is created.  <u>Examples Include:</u> Accounts Payable Reconciliations Accounts Payable Vouchers Accounts Receivable Reconciliations Billing Files Cash Disbursements Cash Receipts Check Requests Employee Expense Reports Employee Relocation Expenses Expense Receipts Invoices Material Receipts Payables	ACC000	6	3	3	6

*Refers to Supporting Retention Requirements*

*Greater of Legal or Operational Requirements*

# Policy and Procedures Development

- Collaborate in the development of the Records Management Program Policy
- Provide best practice information for paper and electronic records:
  - Creation and use
  - Confidentiality
  - Classification
  - Legal holds
  - Destruction methods

## 1.0 Purpose

The purpose of this document is to establish policy with respect to the creation, receipt, use, access, security, privacy, reproduction, retention, preservation, and/or destruction of all Company business records regardless of media or format (including electronic and paper) to ensure satisfaction of corporate legal and regulatory records requirements and business accountability within the context of managing business risks.

The Records Management Policy also establishes the organizational governance and placement of records management responsibilities within the organization. In addition, the Policy also provides guidelines for Monroe Plan for Medical Care ("Monroe Plan") offices in defining their internal records procedures and thereby serves as a framework for establishing consistent and accountable corporate recordkeeping practices.

## 2.0 Scope

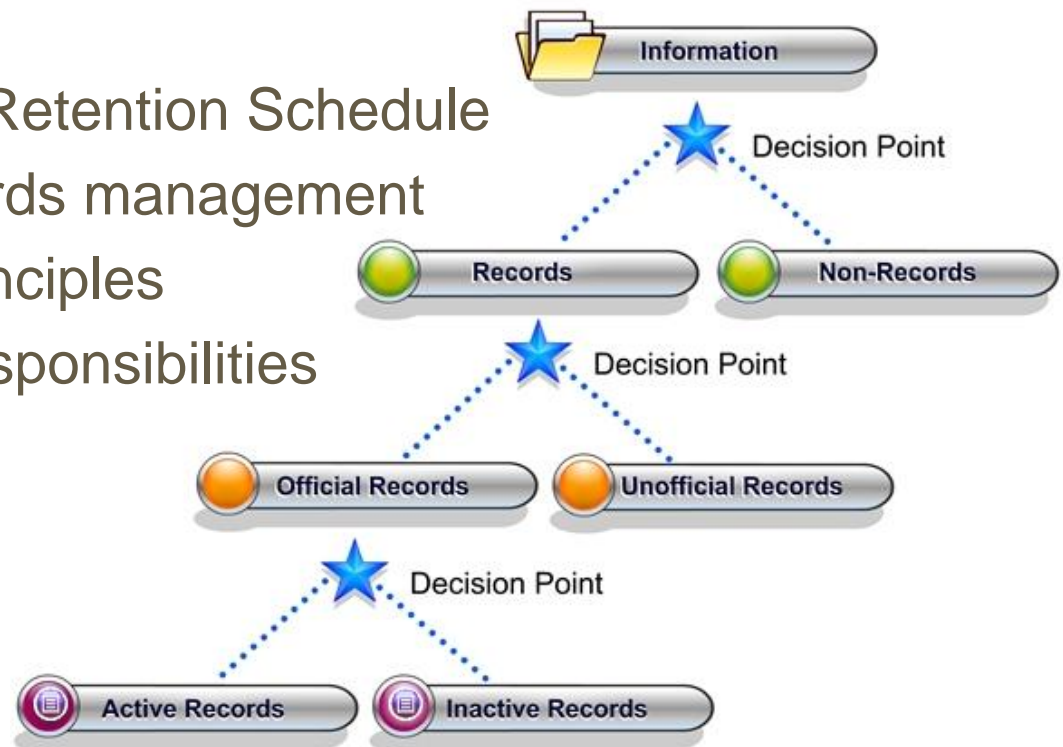
This Policy and subsequent policies, procedures, and standards adopted under the Records Management Program apply to:

- Any and all records created or received in conjunction with the operations of Monroe Plan, regardless of the media or format (e.g., electronic, e-mail, imaged, paper, etc.).
- All physical locations where records are maintained, including firms and individuals acting as agents of Monroe Plan.
- All employees and departments that create, receive, manage, or use Monroe Plan records.
- All contractors, if applicable, who create, receive, manage, or use Monroe Plan records.

This Policy replaces all previous records management policies, procedures, and standards of Monroe Plan departments and sets forth the procedures for amending this Policy. In the future, all records management policies, procedures, and standards must be approved by the Records Management Steering Committee as defined in this Policy.

# Training: Train-the-Trainer

- Training can be on-site or via WebEx sessions
- Participants:
  - Department Records Coordinators
  - Department Managers
- **Session Objectives**
  - Learn to apply Records Retention Schedule
  - Recognize value of records management
  - Understand Program principles
  - Understand roles and responsibilities



# Records Management Intranet Site

- Publish materials on your intranet site
- Provides users with centralized access to RIM Program information
- Indexed, keyword searchable retention schedule/policy documents

The screenshot displays the 'Records Management Intranet Site' interface. At the top, there are navigation links: Home, Glossaries, Reports, Records Retention Schedule, Policy and Procedure Manual, and FAQ. The main content area is divided into two sections. On the left, a 'Search Results' window from Microsoft Internet Explorer shows a search for 'POLICE'. The results list three record classes: CNP100 Community Safety Programs, CNP120 Internal Safety Training, and CNP130 Security. On the right, the 'Record Class Information' for CNP120 is displayed, including details such as the record class name 'Internal Safety Training', business function 'CN Police', and a detailed description of the training programs. A note at the bottom of the record class information states: 'NOTE: If you have a record that might be categorized into multiple record classes,'.

**Records Management Intranet Site**

Home • Glossaries • Reports  
Records Retention Schedule • Policy and Procedure Manual • FAQ

**Record Class Information**

**Record Class Code:** CNP120

**Record Class Name:** Internal Safety Training

**Business Function(s):** CN Police

**Record Class Description:** Records related to training programs conducted annually to keep the Police Department up-to-date on firearms, defensive driving, pepper spray, radar, and use of force. Includes training materials, schedules, and attendance information.

**Official Retention Period:** ACT+5

**Retention Event:** Active for the life of the training program. The retention period begins when the program has been superseded or is no longer offered to employees.

**Record Type Examples:** Attendance Information  
Follow-Up Documentation  
Sign-Off Documents  
Training Materials  
Training Schedules

**NOTE: If you have a record that might be categorized into multiple record classes,**

**Search Results**

Record Classes containing the phrase: **POLICE**

Code	Record Class Name
CNP100	Community Safety Programs
CNP120	Internal Safety Training
CNP130	Security

3 matching Record Class(es) found.

# eLearning Course: Additional Enterprise Wide Training



# eLearning courses: all-employee training



The screenshot displays an eLearning interface for a course titled "Introduction to Records Management". On the left is a "Course Menu" with 56 items, including "1. Introduction to Records Management", "2. Course Navigation", "3. Target Audience", "4. [COMPANY NAME] Records Management", "5. Course Objectives", "6. Course Overview", "7. Course Overview (continued)", "8. WHAT IS THE RECORDS MANAGEMENT P", "9. Definition", "10. Records Management Program Compo", "11. Check Your Understanding", "12. Your Responsibility", "13. Management Responsibility", "14. Corporate Responsibility", "15. Why Manage Records?", "16. Check Your Understanding", "17. Summary: What is the Records Mana", "18. WHAT IS A RECORD?", "28. RECORDS RETENTION SCHEDULE", "37. MANAGING RECORDS", "44. HOW TO APPLY RECORDS MANAGEME", "49. LEGAL HOLDS", "53. Course Summary", "54. Learning Assessment Instructions", "55. Learning Assessment", and "56. What You Need to Do Now...". The main content area shows a slide titled "DEFINITION" with the following text: "As a [COMPANY NAME] employee or contractor, you handle a large amount of information about our customers and our Company every day. This information is found in paper documents, electronic files, electronic communications, websites, databases, blogs, wikis and microfilm. The Records Management Program defines how that information is classified, managed, distributed and retained to achieve compliance with laws and regulations." Below the text is a photograph of three people (two men and one woman) sitting around a table in an office, looking at documents. The bottom of the interface shows a navigation bar with "SLIDE 9 OF 56", "CLICK NEXT TO ADVANCE", a timer "00:02 / 00:02", and navigation buttons.

- Used as a corporate compliance tool
- Rolled out through client's Learning Management System (LMS)
- Most can be translated into any language
- Efficiently reaches all employees, new hires, contractors
- Provides tracking and certification

# International Legal Research

# ILR overview

- Prioritize your global strategy
- Create baseline global Records Retention Schedule
- Client identifies country-specific profile of their business
  - Legal Research
  - Optional recordkeeping issues and requirements:
    - Data privacy
    - Cross-border data transport
    - Media restrictions/requirements
    - Identified by Record Class if applicable
    - With relevant recommendations
- Develop international RM intranet site for client use

# Sample country-specific ILR

A	B	C	D	E	F
Record Class Code - Record Class Name	Record Class Description	Record Types	Cite Local Law that Provides Applicable Retention Requirement	Describe Retention Requirement	Risk Considerations
ACC140 - Banking - Account Activity	<p>Information relating to the activity of bank accounts and arrangements with other financial institutions. Records include bank account activity, statements, and fund transfers. Does not include due from/due to activity.</p> <p>See CSH180 for Due From/Due To Reporting.</p>	<p>Bank Account Fund Transfers, Return Items, Debit / Credit Advices and Transactions and Transfers, Bank Account Transfers, Account Activity Records, Bank Account Statements, Bank Account Correspondence, Deposit Slips, Wire Transfer Notifications, Wire Transfers</p>	<p>1/ Article 37-1 (6) of the Luxembourg law of 5 April 1993 on financial sector, as amended (the "Law") : Financial establishments have to retain according to the time periods set by the Luxembourg Commercial Code, records of any service they have provided and of any transaction they have performed.</p> <p>2/ According to Article 16 of the Luxembourg Commercial Code, supporting documents related to the accounts have to be retained during ten (10) years from the end of the financial year to which they pertain.</p> <p>3/ Article 61 of the Luxembourg Regulation of 13 July 2007 related to the organisational requirements in the financial sector: - Records mentioned by</p>	<p>1/ Supporting documents certified in due legal forms ("acte authentique") which must be retained in original only. Others supporting documents (i.e. private deeds "acte sous seing privé") may be retained in original or in copy. According to article 1334 of the Luxembourg Civil Code, when the original of a private deed no longer exists, the copies may have the same force as the original provided that they have been carried out within a regular management method and when they meet the requirements set out by Luxembourg Regulation. In this respect, the Luxembourg Regulation dated 22 December 1986 states that copies must be faithful and durable, carried out systematically, according to instructions retained as long as the copies, be kept with due care, under a systematic order, and protected against any deterioration.</p> <p>2/ Article 61 of the Luxembourg Regulation of 13 July 2007 related to the organisational requirements in the financial sector: Records have to be retained in a medium that allows the storage of information in a way accessible for future reference by the CSSF, and in such a form and manner that the following conditions are met: (a) the CSSF must be able to access them readily and to reconstitute each key stage of the processing of each transaction; (b) it must be possible for any corrections or other amendments, and the contents of the records prior to such corrections or amendments, to be easily ascertained; (c) it must not be possible for the records otherwise to be manipulated or altered.</p>	<p>According to article 189 of the Luxembourg Code of Commerce, the time period for legal actions related to a commercial relationship is of ten (10) years. Such period may be interrupted or suspended. This time period for legal actions leads in practice to advise financial establishments to retain at least ten (10) records mentioned under this class.</p> <p>According to the article 527 of the Luxembourg Code of Commerce, anyone who has fraudulently destroyed or in any manner whatsoever any binding or discharging document incurs criminal fine of EUR 251.00 to 3,000.00.</p> <p>Moreover, according to article 59 of the Law, the CSSF may impose different administrative sanctions in case of non-compliance of the financial establishment with the retention requirements, such as suspension.</p>

# Electronic Records

# Establish legal and regulatory obligations

Identify “first order” risk-related obligations based on:

- Greatest cost of settlement
- Most harm to brand
- Experience – which are most common
- Most likely to occur in future

## Examples of First Order Obligations

- Employment
- Benefits
- Intellectual Property
- Product Liability

# Application Assessments

Recommendations, best practices, and risk considerations to improve control over e-Records

Determine records management capabilities of each application



Legacy data

Litigation responsiveness:  
search, production, preservation

Data privacy

Long-term retention implications

Provide risk ranking to identify priorities

# Information map

	A	B	C	D	E	F	G	H	I	J
1	Obligation	Record		Creation		Distribution		Storage		
2	Category of Obligation	Record Type	Record Class	Primary Application of Creation	Primary Location	Category of Creators	Intended Recipients	Method of Distribution	Local Storage (User's Personal Drive; Hard Copy)	Electronic storage
3	Product Liability	Calibration Trouble Reports/Failure	MAN1500	MS Excel.	Shared Network Drive.	Quality.	Value Stream Leaders. Customers.	Email.	N/A	Shared Network Drive.
4	Product Liability	Carbon Breaks Mechanical Strength Test Data	MAN2800	MS Word. MS Excel. MTS TestWorks. QI Analyst.	MES Wonderware.	Internal. Test Data received from Pueblo and Spokane Carbon AMF Quality Departments.	Engineering Department. Results are copied into Lot Certification worksheet and QI Analyst (see item 1 above) Hard copy reviewed by Engineering; QI Analyst files available to Engineering for review also.	Interdepartmental Mail (Hard Copy).	Hard Copy. Certification Records are stored in the Test Lab.	MES Wonderware.
5	Product Liability	Corrective and Preventive Action	MAN1800	Pilgrim.	Pilgrim.	Cargo.	Supplier.	Email.	N/A	MS Exchange Server. Pilgrim.
6	Product Liability	Customer Complaints	MKT1100	MS Word.	Shared Network Drive.	Customer Service Representative. Global Sales Team. Field Sales Representatives.	Business Development. Quality. Product Support. Engineering. Finance. Operations. Supply Chain.	Email.	Personal Email Folders. Possible Hard Copy. Flash drive.	MS Exchange Server. Shared Network Drive.
7	Environment	Environment Health and Safety - Corrective Action Plans	AUD1700	MS Excel. Dakota.	Shared Network Drive. Dakota.	Environment Health and Safety Associate.	Environment Health Safety Corporate Auditor.	Email - Review and Approval. SharePoint - Final.	N/A	MS Exchange Server. Dakota. Shared Network Drive.
8	Product Liability	Product Bill of Materials	MAN2300	Oracle ERP.	Shared Network Drive.	Engineering Department.	Internal Circulation.	Oracle ERP.	N/A	Oracle ERP. Shared Network Drive.
9	Toxic Tort	Hazardous Waste Disposal Records	EHS2000	MS Word. MS Excel. MS Access. MS Powerpoint. MS	Shared Network Drive.	Environment, Health and Safety (EHS). Waste Vendor. Waste Haulers.	Waste Haulers. Auditors. Government Agencies. Senior Staff.	Email.	N/A	MS Exchange Server. Shared Network Drive.
10	Product Liability	Manufacturing Process Planning - Machine Shop	MAN2300	SAP.	Shared Network Drive. SAP.	Manufacturing.	Machine Shop.	SAP. Hard Copy.	N/A	SAP.
11	Product Liability	Manufacturing Work Instructions	MAN2300	MS Word.	Teamcenter.	Manufacturing Engineering	Operations Department.	Teamcenter	N/A	Teamcenter.

**Business Owners document lifecycle of “high risk” electronic records: creation, receipt, distribution, storage**



# Application map

	A	B	C	D	E	F	G	H	I	J	
	Application Name	For What Data is This Application the System of Record?	End User Information	Year Placed in Service / Date Range of Data	Legacy Data Information	Does Application Interface with Other Systems?	Do Interfaces Generate Multiple Instances of Data?	Data Production Method with Associated Costs	Ability to Perform Searches or Queries	Ability to Place Holds on Records Systematically	Does App Contain P
1	Oracle ERP (e-Business Suite)	General Ledger, Manufacturing, MRP, Purchasing, Quality, Contracts, Projects.	1000 employees across 5 sites: Danbury, CT; Chelmsford, MA; Princeton, NJ; Barrington, IL; Beale, CA.	2005	Active programs were migrated. Historical data was either converted to Upload database or remained in Legacy Oracle.	Interfaces with PDMLink, Legacy Oracle, AutoTime, Cognos BI	Interfaces do not create multiple instances of data. Pieces of data are transferred between the systems, but not entirely duplicated	There is no systematic way to produce data in response to a discovery order from Legal.	The application has the ability to perform queries.	No.	ERP has requirem
2	Teamcenter	Engineering Data (models-drawings-tech data).	Colorado Springs (COS) location only. The number of end users and their roles varies – not greater than 50 for any listed.	1999	No legacy data was migrated at the time of implementation.	No.	Replicants located at the ICD	Built in.	The application has the ability to perform queries.	No.	N/A
3											

- Focus on software applications/repositories that are data sources (ESI)
- Collect detailed information from Technical Owners of targeted applications
- Directed towards litigation readiness

# Information Management Strategy

- **Establish foundation for an effective, compliant Records Management Program**
- **Implementation and solution options**
- **Assess application capabilities**
- **Structured data**
  - Classification capabilities
  - Assignment of retention rules
  - Legacy data
  - Legal holds
- **Unstructured data**
  - Identify storage locations
  - Options for retention and management
- **Reasonable, practical implementation roadmap defined**

# E-mail Strategy

# eMail – Common Pain Points

- Email is out of control; we're keeping everything. Our storage budget is not keeping pace with our capacity needs.
- Litigation is too costly; too many emails have to be processed during discovery.
- We have a blanket policy for getting rid of emails and it doesn't conform to our records management policy.
- It is too difficult to manage emails with the tools we have.
- We can't rely on our employees to manage email as records.

# eMail Strategy - Methodology

## Collaborate



Assemble a team that represents the combined interests of the organization

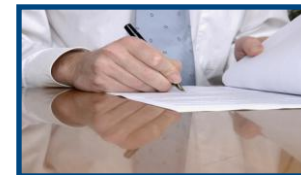
## Explore Requirements



Workshop 1

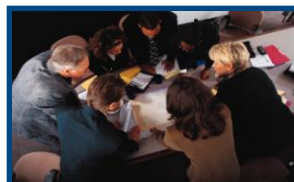
Discuss cross organizational needs and business requirements as a group

## Assess Current State



Gain an understanding of enterprise requirements, constraints, technology and cultural influences

## Enterprise Solution



Workshop 2

Identify and present “best fit” technology and process options to produce a pragmatic solution

# Records and Information Management

## *Think differently about managing your data*

- Identifying active vs. inactive data
- Understanding where your critical data is in the environment
- Classifying the data to make it searchable
- Managing data at the point of creation

## *Creating a go forward records management plan*

- Creating a corporate retention policy and policy and procedures
- Developed plan based on corporate function
- Gaining control of email
- Identify, classify, manage and destroy unstructured data

# Questions & Answers