

# **RIM Infrastructure –**

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# **Does It Get the Job Done?**

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# Learning Objectives

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Upon completion of this session, participants will be able to:

- 1. Examine your RIM program infrastructure**
- 2. Develop tools to check your infrastructure**

# Assessments & Audits

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## ■ **Audit:**

- Examine records or financial accounts to check their accuracy
  - Internal Audit or Legal assess RIM group

## ■ **Assessment:**

- Appraisal / Evaluation
- Made by authorized persons at their discretion
  - RIM Group or Records Reps assess implementation of RIM program & policies

# Assessment Validates RIM Program

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- Policy / Retention Schedule
- Operational procedures to support compliance
- Controls for compliance
- Effectiveness of RIM staff
- Implementation
  - Department practices
  - Classification
  - Procedures to transfer to offsite storage
  - Disposition of records
  - Departing employee procedures
  - Security
  - Legal holds

# Self-Assess Your RIM Infrastructure

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**Through questions related to these areas:**

- **Policies & Procedures**
- **Compliance**
- **Program Structure**
- **Active Program Effectiveness**

# Answer Questions With

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- **Yes**
- **No**
- **Maybe**
- **Don't Know**

# Policies / Procedures

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# Policy (1)

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- Do you have a RIM policy?
- Has your RIM policy been reviewed and/or updated in the last year?
- Does your RIM policy include?
  - Scope
  - Definition of a record
  - Roles and Responsibilities –
    - Employees, Managers of Groups, Managers of People, IT, Internal Audit, Records Reps, RIM, Legal, Tax
    - Contract Owners if contractor is managing records
    - If business units consolidate / dissolve / spin-off...

# Policy (2)

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- Policy on Electronic Communications?
  - Acceptable Use?
  - Identifying records?
  - Filing and maintenance?
- Policy on Information Security?
  - Classifying information – Confidential / Material Non-Public / Internal use
  - Information access?
  - Encryption?

# Policy (3)

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- Is RIM included in your company's Code of Conduct?
  - Creating authentic records...
  - Appropriate use of email...

# Policy - Retention Schedule (1)

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- Has retention schedule been analyzed for what works most effectively in your organization?
  - Big bucket?
  - Listing every record in organization?
  - Combination?
- Are there citations for each record on retention schedule?
  - Legal citation
  - “Administrative Decision”

# Policy - Retention Schedule (2)

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- Has retention schedule been reviewed and updated in the last 12 months?
  - Living document - Updated at least annually
    - Citations – new laws & regulations
    - Input from Owners - Business process changes
- Is retention schedule electronic?
  - In a database?
  - On web so users can customize Schedule

# Policies / Procedures - Electronically Stored Information (ESI)? (1)

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- System Decommissioning, Modifications, Data Migration?
- Developing New Systems?
  - Is RIM a documented key stakeholder in system designs?
  - Does RIM approve retention? Retrievability?
- Does RIM approve migration to imaging system?
- Difference between Backup and Archiving?

# Policies / Procedures - ESI? (2)

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- SharePoint – Administration / Organization / Retention / Governance?
- Websites?
- Group / Shared Folders – How to organize?
- Naming conventions for electronic record?
- Track Changes Feature (How to Turn On / Off)?

# Policies / Procedures - ESI? (3)

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- Use of removable media?
- External labeling of content for diskettes, CDs, DVDs, magnetic tapes reels or cartridges?
- Care & handling of CDs and DVDs - NIST Special Publication 500-252?
- Storing magnetic media and recordable CDs, DVDs (temperature / humidity controls)?

# Policies / Procedures - ESI? (4)

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- Is RIM on Taskforces addressing ESI issues?

# RIM & Compliance

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# RIM & Compliance

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- As a core compliance area, has RIM been discussed at a Compliance Committee meeting this year?
  - If not, develop an action plan
    - Request to be added to the agenda
    - Report on “State of RIM”
    - Layout strategy to chg current state & ask for support
- Are VPs required to certify fulfillment of annual RIM compliance requirements?
  - “Conducted RIM Awareness Event”
  - “Completed assessment survey”

# RIM & Compliance

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- Are there RIM responsibilities on every employee's performance review?
  - “Complies with RIM by keeping records organized, retained according to the Retention Schedule...”
- Would GARP principles help sell the RIM program?
  - Generally Accepted Recordkeeping Principles

# RIM & Compliance

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- Is RIM program appropriately placed in your organization?
- Does current organization provide support and understand importance?
  - Suggest Legal or Compliance
  - If not, request to be moved

# Program Structure

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- Communication
- Records Representatives
- Relationships
- Legal Holds

# Program Structure-Communication

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- Was anything done in last 12 months to increase awareness?
  - Compliance Committee? // Executives?
  - Managers? // Employees?
- Is there an annual RIM Communication Plan?
  - Company bulletins? Brochure? / Website?
    - RIM Fundamentals / Services
    - Legal Holds, etc.
  - Reference Card with email etiquette & tips
  - Poster with RIM info

# Program Structure-Communication

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- Is there central place for RIM policies & procedures?
  - Website, SharePoint site or equivalent?
  - Real web pages / pdf or document farm?
    - About RIM-Contacts / Policy / Record Reps / Services
    - Retention
    - Storage
    - Disposal
    - Organization
    - Toolkits [Forms / Job Aids / Awareness Event, etc.]

# Program Structure-Communication

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- Was an in-house RIM Conference conducted in last 12 months?
  - For Records Reps & others responsible for records
  - Could be several short classes via LiveMeeting scheduled during “RIM Month”
  - Topics:
    - Mock Trial
    - Email, Electronic Records, How to manage a SharePoint site, etc.
  - Not official training – intended to increase awareness and understanding

# Program Structure-Communication

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- Was there company-wide RIM Awareness Event in last 12 months?
  - “Annual Review of Records”
    - Make it an annual goal for Records Reps
    - Provide
      - Outline of what Records Reps are to accomplish
      - Ways to measure success
      - Posters to advertise
      - Training upon requested
    - Require Final Report to measure success
- Is there a toolkit - “RIM for Employees?”

# Program Structure-Communication

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- Is there an awareness program for New Hires?
  - Speak at New Hire Orientation?
  - RIM - Included in New Hire Guide?
  - Part of New Hire web training?

# Program Structure-Records Reps

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- Does Policy require department “Records Reps”?
  - Named by Dept Heads for Dept or an Organization
  - Higher the level the more participation
- Are Records Reps duties outlined in policy?
  - Attend annual RIM training (required)
  - Act as their group’s subject matter expert on RIM
  - Serve as liaison with RIM
  - Primary contact with Legal for Legal Holds
  - Work with management to ensure business controls in place and group in compliance
  - Responsibilities are part of performance review

# Program Structure-Records Reps

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- Did RIM provide annual Records Rep training?
  - Required - Face-to-face or Conference Call
  - Official course logged in employee's training history
    - Policies / Definitions / RIM Program / Record Life Cycle
    - Electronic Records
    - Roles & Responsibilities
    - Retention Schedule
    - Disposal
    - Creation / Organization Plan
    - Record Storage

# Program Structure-Records Reps

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- Are there annual goals set for the Records Rep?
  - Annual goals
    - “Conduct RIM Awareness Event”
    - “Complete assessment”
    - Document compliance by requiring final report...
    - Include in training
  - Communicate via email several times per year
    - “You are receiving this email because you are the Records Rep. If your responsibilities have changed, let RIM know”

# Program Structure-Relationships

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A relationship is when you feel free to

- Call and ask questions
- Tell them how a process should work
- Meet with them at least annually
  
- Has a “RIM” attorney been assigned?
  - Supporter / knowledgeable about operations
  - Assist with determining retention periods (not legal research)
  - Legal / Regulatory interpretations
  - Suggest they attend RIM class in the legal world<sup>30</sup>

# Program Structure-Relationships

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- Do you have a relationship with the following organizations?
  - Compliance
  - Legal (Attorneys & Paralegals)
  - Tax / Finance / Accounting
  - Internal Audit
  - Information Technology

# Program Structure-Relationships

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- Have you met with IT in the last 12 months?
  - Are you talking their language?
- Have you assisted any Depts or assessed their RIM compliance in last 12 months?
  - If not, you need to
    - Understand their needs
    - Reiterating what RIM is and can provide

# Program Structure-Relationships

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- Have you made a presentation to any of these organizations in last 24 months?
  - Compliance
  - Legal
  - Information Technology
  - Departments
  - Enables contact with higher level management

# Program Structure-Relationships

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- Are there any roadblocks in your role?
  - Culture
  - You
  - Your team

# Program Structure- Legal Holds

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- Is there a written Legal Hold policy? Process?
  - Outlined on RIM website
- Is there annual communication / reminder to employees on
  - Legal Hold process?
  - Current Legal Holds?
  - When cases end?
- Is there a list of MAJOR Legal Holds available to employees, Records Reps, RIM?

# Program Structure- Legal Holds

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- Is RIM informed of Legal Holds initially?
- Is there a standard Legal Hold form?
  - Name of Case / Matter
  - Dates of Records Required
  - Description of Records
  - What to do with documents - Send to Legal or hold until further notice
  - ESI – what database, systems, applications, etc.
  - Respond to / Respond by Signature

# Active Program Effectiveness

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- Electronically Stored Info (ESI)

# Electronically Stored Information (ESI) Inventory

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- ESI Inventory or Catalog?
  - Similar to records inventory
  - Comprehensive & defensible inventory of data environment
    - All servers, systems, records in systems
    - How systems fit together
  - Regularly updated
- Data Map?
  - 1 Case
  - Sub-set of ESI Inventory

# ESI inventory includes (1)

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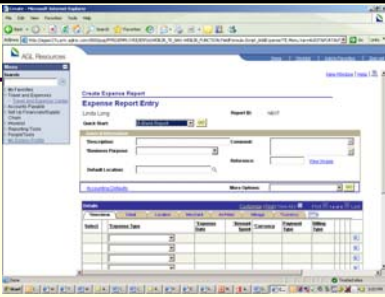

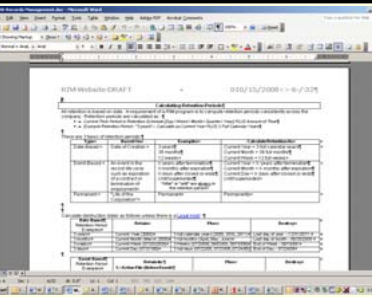

- Application Name
- Application Owner
- Application Classification (Accounting, HR, Tax, etc.)
- ESI Source [Email, File / Print Servers, Enterprise Resources Planning (ERP), Instant Messaging, & Legacy Systems]
- ESI system (Microsoft, Oracle, SAP, PDF, etc.)
- How accessed/used by users and IT Mgt

# ESI inventory includes (2)

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- Age of data in system
- What system stored in
- What version is the system
- Where is it located
- Is there a purging routine
- What is the purging routine
- If legacy system,
  - Was data migrated to new system?
  - Does data reside in legacy system backup, etc.?

# Today's Recordkeeping

			
<p style="text-align: center;"><b>Structured</b></p>	<p style="text-align: center;"><b>Semi-Structured</b></p>	<p style="text-align: center;"><b>Unstructured</b></p>	<p style="text-align: center;"><b>Physical</b></p>
<p><b>Relational Databases</b></p> <ul style="list-style-type: none"> <li>■ PeopleSoft</li> <li>■ Access Databases</li> <li>■ Others?</li> </ul>	<ul style="list-style-type: none"> <li>■ SharePoint</li> <li>■ Websites</li> <li>■ Email</li> <li>■ Scanned Docs</li> <li>■ Digital Images</li> <li>■ Text Messages</li> </ul>	<ul style="list-style-type: none"> <li>■ File systems (Word, Excel, PPT, etc.)</li> <li>■ Audio / Video</li> <li>■ Photographs</li> </ul>	<p><b>Paper</b></p> <ul style="list-style-type: none"> <li>■ Printed Computer Repts / Docs / Presentations...</li> <li>■ Handwritten originals</li> </ul> <p><b>Core Samples</b></p>

# Structured Data

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- Is there complete and up-to-date technical documentation for each electronic information system?
- Systems on retention schedule?

# Semi-Structured Data

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- Procedural controls for all electronic record keeping systems (magnetic, imaging, SharePoint, etc.)?
  - To protect integrity of records and
  - Ensure legal admissibility under rules of evidence
- Email Training?
  - What to keep / what not to keep?
  - Classification? - Transitory / Work-in-Progress / Official?
- Email Management?
  - System - Time frame? Size of email account?
  - Place to safely retain official records?

# Unstructured Data

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- Is there training on where to put data?
  - Network drives?
  - Local / Hard drives?
- Is there an Organization/Retention Plan?
  - Group Drive - Top Tier Folders
    - By group Functions / Activities / Projects
- Do you need central management in a system?
  - Document Mgt? SharePoint?
- Monitored for compliance?

# If answer to any question was **NO** or **MAY BE** or **DON'T KNOW**

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- Analyze results (Note strengths & weaknesses)
- Identify and prioritize areas to improve
- Identify and prioritize solutions
- Identify how to measure success of solutions
- Develop Strategic Plan and Action Plans

# Develop Strategic Plan

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- Develop policies for e-records – email....
- Revise Retention Schedule...
- Provide procedures for ...
- Develop training for ...
- Reduce or eliminate roadblocks ...
- Attend training – ARMA, AIIM...

# Develop 2-3 Action Plans Under Strategic Plan

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Reduce or eliminate roadblocks

- Through relationship building
  - Meet with ...
- Through better RIM training
  - Develop training for ...
  - Develop Communication Plan...
- If you had more confidence
  - Through better training - Attend ARMA Conf
  - By earning CRM?

# Other Ways To Assess

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- Self-Assessment
- Surveys / Questionnaires
- Interviews
  - Individual Employees
  - Group of Employees / Department
  - Executive
- Physical Review
  - Department Files
  - Network shared drives
  - Individual desktops
  - Record systems
  - Corporate systems
  - Other places where records are stored

# See Atlanta ARMA Website for

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- ARMA Conference 2009 Presentation
  - Self Assessment
- Sample assessment questions for
  - Records Reps
  - Executives
- Assessment Resources

**Records Management is a journey!**