First Annual URIM Conference
January 28, 2015
Welcome – Russ Taylor – Library Administration
Howard Loos, CRM - Essential Elements of a Successful RIM Program
Greg Danklef – Communication
Lunch
Chris Calton – Training
Joshua Bullough/David Fleming, CRM – ARMA
Snack Break
Q/A Session
Howard Loos, CRM - Next Steps in Building your RIM Program
Agenda

• Current State of Records & Information Management
• Record Related Risks to Universities
• Industry’s Approach to Mitigate Risks
• Essential Elements of a RIM Program
Records Lifecycle Approach
The Information Governance Reference Model

A holistic approach

http://www.edrm.net/projects/igrm
Current State of RIM

- Nearly all records are born digital
- Paper records continue to be created and retained
- Electronic records are everywhere
- Outside of highly regulated areas, electronic records are not being captured and have few, if any, RIM controls:
  - Retention - Limited Security
  - Disposition - Limited Access
  - Litigation Hold
Potential Sources of Electronic Records

- Email
- Desktops/Laptops
- Servers/Mainframes
- Applications
- Removable Media
- Cell Phones/PDAs
- Instant Messaging
- Web Sites
- Voicemail
- News Feeds
- Blogs
Some Record Related Risks

• Not retaining records needed to document and support the business activities of your university (Legal/Risk Mgmt)
• Destroying records subject to a litigation matter (Legal)
• Not preserving records of enduring value (Historical/Archives)
• Employees not following or aware of RIM/RRS policy
• Not following retention policy
• Unauthorized access to confidential information (PII/FERPA)
• Not addressing electronic records
 Industry’s Approach to Mitigate Risks

• Use third-party apps to gain RIM control over records:
  – Email
  – Hard Drives/Shared Drives
  – SharePoint sites or other repositories
  – Structured Data Systems

• Send Records to Archive or Manage In Place (Retention)
• Apply Litigation Holds (Records, Folders, Search Results)
• Create a defensible disposition process (lock down/review)
• Add features: Search, de-dupe, compress, encrypt, security
Implementing a software solution, alone, will not resolve your records and information management challenges

Proven Fact
Building a RIM Program is a Journey

Three Major Phases

Business Readiness

Implementation

Sustainability
Building a RIM Program is a Journey

- Business Readiness
- Implementation
- Sustainability

Multiple Year Journey
1. Complete an Assessment
2. Develop Organizational Governance
3. Develop a RIM Policy
4. Develop a Functional Retention Schedule
5. Inventory/Records Management Plan
6. Create Litigation Hold Procedures
7. Create Defensible Disposition Procedures
8. Change/Project Management
9. Process and Technology Implementation
10. Sustainability
Element #1 – Assessment

- Interview key stakeholders (3 to 5)
- Interview department employees (10 to 20)
- Current state findings
- Maturity model
- Desired future state
- Recommendations
- Roadmap
Current State Findings

Your assessment should address the following areas:

• Physical records
• Electronic records
• RIM Policy and Retention Schedule
• Disposition process
• Legal hold procedures
• Governance structure
• Technology
• Compare policies with practices
Maturity Models

- Used to identify gaps between your Current and Future State:
  - People
  - Process
  - Policy
  - Technology
- Helps to identify risks (motivation to change)
- Standards to help compare your organization with others:
  - Generally Accepted Recordkeeping Principles (GARP)
Maturity Model formerly known as GARP
Recommendations

- Recommendations should align with and address each of the key, current state findings.
- Recommendations should be ranked in order of priority, in order to close high-risk gaps:
  - Short-term – Address immediately, within the next three to six months
  - Mid-term – Address between six months and two years
  - Long-term – Begin addressing after two years
Three Phases of a RIM Program Implementation

Business Readiness

- Update Policy and Retention Schedule
- Tracking Solution Requirements
- Update URIM Website – one-stop-shop
- Initiate Department/College Training
- Update Litigation Hold Procedures
- Records Transfer Sheets – online access
- Update Department Liaison Directory
- Define RIM Requirements for SharePoint 2013
- Define Content Type & Metadata Model
- Define Organizational Governance Structure

Implementation

- Implement Tracking Solution for Records Center
- Install SharePoint 2013
- Pilot SharePoint 2013
  - Phased Rollout:
    - Function or Business Activity
    - Dept/College/Division
- Implement RIM Add-in to SP 2013
- Change Management
  - Communication
  - Training
  - Developing Support
  - Coaching Supervisors

Projects Not Started
- Projects Started
- Projects Completed

Sustainability

- Measuring & Reporting
- Auditing for Compliance
- Ongoing Training & Support
Element #2 – Organizational Governance

• A mechanism organizations use to influence its members to contribute to or align with organizational goals and objectives.

• Organizational Governance is needed, in order to:
  – Make Decisions and Obtain Approvals
  – Inherit/Obtain Authority
  – Empower Members to Change “give permission”
Establishing Organizational Governance

• Governance Charter
• Defined Roles and Responsibilities
  – Leadership Roles
  – Supporting and Specialist Roles
  – Technical Roles
• Align with or leverage existing organizational structures
  – Information Governance
  – Privacy & Security
  – Document Management & Content Management
  – Risk Management, Compliance & Audit
Sample Elements of a Governance Charter

- Authority – grants authority to the program and roles
- Vision – define vision of program
- Standards – guiding principles (lifecycle management)
- Scope
  - Unstructured, structured, messaging, physical
  - Where is the program headed (Desired Future State)
- Program Approach – projects and strategies
- Governance Structure – formalizes roles & responsibilities
- Roadmap – how to get there and how long
- Change Management – communication, training, sponsorship
BYU Governance Structure

13 colleges/divisions
Approx. 400 Departments
Approx. 5000 Offices
Roles and Responsibilities

- Executive Sponsor
- RIM Advisory Committee
- Records & Information Management
- Records Coordinator Network
- Employee Supervisors/Department Heads
1. Ensure RIM program is robust enough to meet overall goals and objectives of the organization

2. Recommend and approve overall RIM strategy, vision and policy for the creation, gathering, maintenance, retirement, preservation and final disposition of paper and electronic records

3. Determine role of compliance, legal, audit, technology and departments within RIM program

4. Recommend business unit/department responsibilities, performance expectations, and accountability standards for RIM

5. Approve changes to RIM policy and Retention Schedule

6. Set direction and provide support for activities of RIM Liaisons

7. Ensure RIM program is aligned with overall university risk management strategy
1. Oversee policies and procedures to direct the Record Management activities to ensure they align with overall goals of the organization
2. Provide training and expertise to departments
3. Identify and integrate regulatory or legal requirements that impact the Record Management program
4. Provide Records Management guidance to Information Technology for projects or system changes that impact the storage of records
5. Oversee educational content for Record Management website
6. Manage the organization’s records retention and disposition process
Department Heads

- Identify Records Coordinator for department or working group
- Formalize Records Coordinator role in their department
- Communicate to department employees about the importance of the RIM program
- Review training activity reports for their department
1. **Oversee department efforts** to adhere to approved records retention, archive and disposition strategy
2. Respond to management and **employee inquiries** and questions within department
3. Develop and maintain department records **inventory and action plans**
4. Review and approve listings of records that are eligible for destruction
5. Ensure **department compliance** with the university records management policy
6. Provide **reporting** on department records management activities
7. Support departmental compliance with orders to suspend records destruction due to legal holds
Element #3 – RIM Policy

• Policies take time to approve (often more than a year)
• Keep it high-level and keep it short (2-3 pages, max)
• Address key areas needed to move the RIM program forward, such as:
  – Electronic and Paper Records
  – Records Retention and Destruction
  – Records vs Non-records (Business Information)
  – Information Lifecycle Management (ILM)
• Key areas to reference:
  – Retention Schedule
  – Legal Holds
  – Disposition Processing
Element #4 – Retention Schedule

• Provide retention requirements for the organization
• Traditionally Department-based Retention Schedules
• Organizations are moving to Functional-based Retention Schedules to support e-records
• Reference legal and regulatory citations
• Should include reference for non-record information
• Specify Time or Event-based rules
## Departmental Retention Schedule

<table>
<thead>
<tr>
<th>Department Name</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>AACSB Accreditations Materials</td>
<td>P P</td>
</tr>
<tr>
<td>Employee Files</td>
<td>10 D</td>
</tr>
<tr>
<td>Executive Lecture Files</td>
<td>P P</td>
</tr>
<tr>
<td>External Relations Files</td>
<td>5 D</td>
</tr>
<tr>
<td>Kemper Scholarship</td>
<td>10 D</td>
</tr>
<tr>
<td>NAC Records</td>
<td>5 D</td>
</tr>
<tr>
<td>Presentation Tapes</td>
<td>P P</td>
</tr>
<tr>
<td>Management Society History/Correspondence</td>
<td>P P</td>
</tr>
<tr>
<td>Newspaper Clippings/Pictures</td>
<td>P P</td>
</tr>
<tr>
<td>Student Association/Club Records</td>
<td>P P</td>
</tr>
</tbody>
</table>
Functional Retention Schedule Structure

Business Function

Human Resources (HUM)

Record Series

HUM03
Employee Recruitment and Selection
3 years

HUM07
Personnel Files Non-Medical
6 Years after Termination

Record Types

Inherits Retention

Applications

Resumes

Background Checks

Performance Appraisals

Promotions

Transfers
<table>
<thead>
<tr>
<th>Record Series Code</th>
<th>Record Series Name</th>
<th>Record Series Description</th>
<th>Retention Event</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUM01</td>
<td>Benefits Enrollment and Distribution - Employee Specific</td>
<td>Any recorded information related to participation in company-sponsored benefit plans. Includes health and life insurance, pension, 401K, disability, medical, vacation and sick benefits, leave of absence plans, educational assistance, savings plans and payroll direct deposit elections.</td>
<td>The retention period begins when the piece of content/object is marked final/declared a record</td>
<td>75 years</td>
</tr>
<tr>
<td>HUM02</td>
<td>Benefit Plans - Plan Specific</td>
<td>Any recorded information related to company-sponsored benefit plans. Includes health and life insurance, pension, 401K, disability, medical, vacation and sick benefits, leave of absence plans, educational assistance, and savings plans.</td>
<td>Retain while benefit plans are active. The retention period begins when the benefit plan expires or is cancelled.</td>
<td>As long as plan is active + 6 years</td>
</tr>
<tr>
<td>HUM03</td>
<td>Employee Recruitment and Selection</td>
<td>Any recorded information related to employee recruitment including job postings and personnel requisitions. Also includes records for applicants not hired such as job applications, background check results, resumes, and interview notes. Refer to HUM07 for recruitment and selection information for applicants who are hired.</td>
<td>The retention period begins when the piece of content/object is marked final/declared a record</td>
<td>3 years</td>
</tr>
<tr>
<td>HUM04</td>
<td>Employee Relations</td>
<td>Any recorded information related to employee suggestions, inquiries, complaints, and grievances, including investigation and follow-up. Also includes employee communications such as newsletters. Refer to LEG05 for complaints and grievances resulting in legal projects.</td>
<td>The retention period begins when the piece of content/object is marked final/declared a record</td>
<td>6 years</td>
</tr>
</tbody>
</table>
Implementing Retention Schedules

• Retention rules must be translated into your electronic records environment
• Avoid Event-based retention whenever possible
• Rules of Thumb:
  – Time-based retention is generally applied to individual records
    • 3 years after creation or ECY (easier to apply to electronic systems)
  – Event-based/Case-based retention is generally applied to groups of records
    • Projects – 7 years after closure
    • Employees – 10 years after departure
    • Contracts/Agreements – 6 years after expiration
Two Major Types of Records

- **Individual Records (Subject)**
  - Retention is managed for each Record
  - Time-based Retention
    - Retention begins at Creation
    - Administrative Records or Meeting Minutes

- **Case-based Records (on average 2/3 of your records)**
  - Retention is managed as a group of related Records
  - Event-based Retention
    - Retention is not known at Record Creation
    - Project Files – Retention begins at Project Closure
    - Contract Expiration – Retention begins when Contract Expires
    - Employee Files – Retention begins with Employee Departure
    - Asset Files – Retention begins with the Sale or Discontinuance of an Asset
Current State of Records Center Activity

Records Center Capacity of 15,000 Boxes

- **New Boxes**
  - Approx. 1,400 New Boxes/Yr

- **Approx. 80 Requests/mo.**

- **TEMP Financial/Administrative**
  - Avg 3 to 7 years
  - Destroy approx. 1,000 boxes/yr

- **TEMP Academic**
  - Avg 10-20 years
  - Approx. 200 boxes sent to Archives/yr

- **PERM**
Element #5 – Inventory/Records Mgmt Plan

Identifies the records created or maintained by a department, as well as the retention requirement and action plan for each record.

Steps include:

1. Develop records Inventory (listing of departmental records)
2. Identify if paper or electronic – or both
3. Identify retention requirements for each record type
4. Identify storage location(s) for each record type
5. Develop an action plan for each record type
<table>
<thead>
<tr>
<th>Item no.</th>
<th>Records Series Title</th>
<th>Records Category</th>
<th>Medium</th>
<th>Retention Event</th>
<th>Final Disposition</th>
<th>Procedure/Special Instructions/Systems Used (if electronic)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Department Meeting Minutes</td>
<td>TBD</td>
<td>Paper/Electronic</td>
<td>PERN</td>
<td>Archives</td>
<td>Retain current year + 5 years in the department. Transfer to the Records Center for 5 years and then transfer to the University Archives.</td>
</tr>
<tr>
<td>Example</td>
<td>Kronos Reports</td>
<td>TBD</td>
<td>Electronic</td>
<td>3 Years</td>
<td>Destroy</td>
<td>Retain in department for 3 years and then destroy.</td>
</tr>
<tr>
<td>Example</td>
<td>Undergraduate Student Records [department]</td>
<td>TBD</td>
<td>Paper/Electronic</td>
<td>GRA + 10 Years</td>
<td>Destroy</td>
<td>Retain electronic records in department for 10 years and then destroy.</td>
</tr>
</tbody>
</table>

1

2

3

4
Inventory Mapping to Retention Schedule

Classify Records
- I-9
- Performance Appraisal
- Pension
- Employment Application

Records Category (Retention Applied Here)
- Employee Files
- Benefit Plans
- Benefits Enrollment and Distribution
- Employee Recruitment and Selection

Assign

Retention Rules
- 8 CFR 274A.2
- 29 CFR 1607.4
- 29 CFR 516
- 29 CFR 1627.3
- 29 USC 1166
- 29 USC 1027
- 29 CFR 1627.3
- 29 CFR 1602.14
College Level Workshop Activities

1. Identify each department represented in the workshop
2. Identify records created or maintained by each department
   1. Identify whether paper or electronic (or both)
   2. Identify key process each record supports
   3. Identify where these records are stored
      1. File Shares
      2. Systems (get name of information system)
      3. Department filing areas
3. Develop an action plan for each record
Element #6 – Legal Hold Procedures

• Generally a procedure and not a policy
• Definition of “Record” or “Business Information”
• Broad or Targeted Holds
• Instructions to recipients (responsibility & what to do and what not to do)
• Preservation method (collect or hold in place)
• How will targeted hold notices be tracked and released
• Systems of record locations and methods (datamap)
Element #7 – Disposition Procedures

• Written disposition procedures to address:
  – Legal review
    • Are all legal holds communicated to departments and RIM?
    • Are legal holds applied to records?
  – Department review and approval
    • Review records or higher level groups of records (i.e. names of projects, employees, cases, annual collections)
    • Required approval, look for exceptions or automated destruction
  – Archival review
    • Identify records of enduring or historical value
    • Determine how they will be transferred or preserved
Element #8 – Change/Project Management

• Responsibility of project must be assigned to someone

• Need to manage the People Side of Change
  – Develop Change Management Plan:
    • Define the Change Management Team
    • Sponsorship & Support Model (define who will support/promote the change)
    • Develop Messaging
    • Communication Plan
    • Training Plan
  – Manage the Change (in conjunction with process or technology change)
  – Reinforcing the Change (measurement, reporting and celebrating success)
Change Management Effectiveness

Correlation of change management effectiveness to meeting project objectives

#1 Success Factor

- To Have an Executive Sponsor

- Participation in program:
  - Funding
  - Communicate with organization
  - Obtain the support from other stakeholders
Communication Plan

• An initial Communication Plan to address project communication will be developed to identify stakeholders and their communication requirements including key messages, communication vehicles, frequency, and other information.

• Communication consisting of scripted emails, announcements, slide decks, and demos. “Packet”

• The Communication Plan will be maintained and executed by the ECRM Program.
Communications

• Purpose:
  – Build awareness of program and its purpose
  – Coach leaders on their roles

• Types of Communication:
  – Executive Sponsor to organization
  – Executive Sponsor to department heads
  – RIM to department heads (coaching)
  – Department heads to department employees

• Make it easy for executive and department heads to communicate “Send Packet”
Training Plan

• As governance and roles are defined, it is imperative that users are not only aware of the change, but understand and are equipped to respond to those changes.

• An initial training plan will be developed to identify training requirements, content and frequency for the various roles.
Training

- In person
- Online modules
- Scheduled or as needed
- Train support personnel first

Questions to answer:
- Is training required?
- Does training activity need to demonstrate an organization’s good faith effort to comply with policy and program goals?
  - How will training activity be tracked?
  - Will training activity be reported? To whom?
Coaching

• Use Communication and Training to “Coach” department heads and supervisors in their role (this is often overlooked)
Element #9 - Implementation

- Requirements
- Technology selection (RFP & Vendor Selection)
- Proof of Concept (POC)
- Pilot (Pick a good place to start and learn from)
- Rollout
  - Phased rollout
    - By Function or Business Activity (Academic/Finance/HR)
    - One college or department at-a-time
Requirements

• Business Requirements
  – Need system to manage electronic records and minimize risk

• Functional Requirements
  – Ability to upload record without requiring user to enter metadata

• Technical Requirements
  – Compatibility with Office 365

• Identify “must have” vs. “would like to haves”
  – System must...
Technology Selection

• Request for Proposal (RFP) and Vendor Response
  – Pin vendor down (OOB, Minor Configuration, Customization)
  – Leverage standards (MoReq, ISO 15489, DoD5015.2)
• Vendor Selection
  – Narrow it down to 3 or 4 Vendors
  – Check References – especially in your industry
  – Compare total cost of ownership
Element #10 - Sustainability

- Define Success (what does success look like)
- Measuring & Reporting
- Auditing for Compliance (control catalogue)
- Ongoing Training & Support
- Continuous Improvement
- Address ongoing changes to organization/technology
Thank You/Questions

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