Understand how managing storage of records and information affects your company

These days almost every organization needs to implement a records and information program. Putting a program in place helps you manage your records and information to meet your business needs and comply with laws and regulations. This book guides you through the process of implementing a records and information program.

- The basics of records and information storage — the need-to-know terms and fundamental processes
- Get your program going — understand the benefits and get support from management before you start
- Create helpful documents — understand what you have (appraisal), how long you need to keep it (retention schedule), and create an outline for your co-workers (policy)
- Managing records and information effectively — know the best practices for keeping an ongoing system in place
- Creating electronic versions — your company may want to create a scanning program for paper documents; you need to gather information to decide whether to keep it in-house or outsource it

Open the book and find:
- Top trends in records and information management
- Definitions of common terms
- Ways that implementing a records and information management program can reduce costs
- A list of what to include in your policy

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Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks, and inefficiencies of managing their physical and digital data. The company’s solutions enable customers to protect and better use their information — regardless of its format, location, or lifecycle stage — so they can optimize their business and ensure proper recovery, compliance, and discovery. Founded in 1951, Iron Mountain manages billions of information assets, including business records, electronic files, medical data, emails, and more for organizations around the world. Visit www.ironmountain.com for more information.
Introduction

Every business, regardless of legal status, annual revenue, or number of employees, creates and receives information, some of which makes up part of the official records of the organization. Records need to be retained in accordance with governmental requirements and operational need, whether you work at the local bagel vendor or a Fortune 500 company.

Just as businesses track and manage equipment, cash, and real estate, companies should take the same approach to their information. Managed properly, records and information provide organizations many benefits, such as the ability to make timely and informed decisions, reduced storage costs, and compliance with laws and regulations.

Not understanding what information a company possesses, where it resides, and how to properly manage it can place an organization at risk. Risks can consist of fines, penalties, public relations nightmares, work stoppages — as well as a possible stint in the local federal penitentiary.

Don’t despair! As dire as it may sound, there are approaches and proven best practices that any organization can put into place to mitigate these risks. Understanding the fundamentals of how to properly manage your records and information will assist you in developing and implementing an effective and compliant program.

About This Book

If developing and implementing a records and information management program seems like a daunting task, you’re correct. However, with the right guidance and resources, it can be very manageable. This book has been written to help you understand the fundamental elements and practical steps needed to start and sustain an effective records and information management program.

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This book will assist you in analyzing the current state of records and information management within your organization and provide insight into possible exposures and risks that can impact the company. In addition, this book explores other related topics that will allow you to assess the feasibility of outsourcing certain functions and how to stay abreast of records and information management challenges and trends.

I made some assumptions about what you know:

- You understand that most records and information reside in either paper or electronic format.
- You know you have to retain some information.
- Your organization probably stores records and information in multiple repositories.
- Not managing your records and information is bad.

**Icons Used in This Book**

Throughout the margins of this book, you’ll find several helpful little icons that point out particular types of information.

- **REMEMBER**
  Write this information down on a piece of paper and put it up on your fridge. This is important info that you should remember.

- **WARNING!**
  This icon marks information that could contain pitfalls for your records and information program. Take heed!

- **TIP**
  Here are some time-saving tips or tricks.
The ABCs of Records and Information Management

In This Chapter
▶ Defining the terms
▶ Looking at the fundamental elements of a records and information management program

These days almost every organization needs to implement a records and information program. Putting a program in place helps to make sure you manage your records and information to meet your business needs and comply with laws and regulations.

A records and information management program has many components. The first step in developing and implementing your program is to understand the jargon. This chapter goes over some common terms and also discusses some of the most important program elements.

The Inside Scoop – Terms and Terminology

Understanding the meaning of records and information may sound elementary; however, knowing how the terms are used is important. There are differences and similarities. For example, all records constitute information, but not all information is a record.
Over the years, several terms have been used to identify information: knowledge, intelligence, and content to name a few. But the definition of records hasn’t changed. Understanding each term is an important first step in creating your records and information management program.

This section discusses key terms and gives you an understanding of how to identify and classify each type of item.

**Explaining what information is**

For a moment, picture your business as a finely crafted automobile. It has been manufactured and designed to be efficient, agile, and appointed with all the amenities.

Now imagine you can’t drive it because you don’t have the proper fuel. Information is the fuel that keeps your company operating. The ability to access the proper information at the right time to make the best decisions possible is vital to your company’s competitiveness, profitability, and existence.

In layman’s terms, *business information* is the total volume of, but not limited to, all paper and electronic documents, spreadsheets, recorded telephone conversations, databases, and tacit or *grey matter* knowledge. Note that information is an all-encompassing term and all other terms discussed in this chapter are subsets.

**For the record**

So where do records fit into the equation? Records can be considered the memory of the organization. Records comprise a small percentage of the information population of a company; however, they’re extremely important to the continuing operation of a business.

Some records have *operational value*, such as accounts receivable; you want to know how much you’re owed. Employee files represent a comprehensive view of employment that can be used to determine past performance and promotion eligibility. Some records have *organizational value*, such as the company’s history, Articles of Incorporation, and Board of Director meeting minutes.
ARMA International (a non-profit professional association for records and information folks) defines a record as:

*Recorded information, regardless of medium or characteristics, made or received by an organization in pursuance of legal obligations or in the transaction of business.*

In all likelihood, any information that you have that serves as evidence of your company’s transactions and legal responsibilities is a record. This includes information such as contracts, employee files, invoices, and tax returns. All records must be assigned a specific retention period (see Chapter 4 for more on this topic) based on laws and regulations. For operational purposes, a company may decide to retain some records longer than required by law.

As important as all records are to your organization, *vital records* are the most important. Don’t worry, no wordy definitions. Vital records would be needed to resume your company’s operations in the event of a disaster. Vital records are categorized as either organizational or operational.

- **Organizationally vital records** are items such as Articles of Incorporation, Board of Directors minutes, and by-laws. Vital records of this nature help an organization re-establish its legal existence.

- **Operationally vital records** are needed to resume critical business functions and ensure that your revenue stream stays intact. In most cases, you can’t resume operations if you’re unable to pay your employees, provide your products or services, or collect on accounts receivable.

Vital records should be identified and protected in a manner that allows them to be secured, protected, and readily available.

**Value added**

Information of *business value* is important to a company, but doesn’t meet the criteria of a record. Think of business value information as referential material such as spreadsheets, reports, and presentations. It assists in decision-making, but has a finite purpose and life (such as a spreadsheet that you create to show the boss how you’ve analyzed a certain...
matter). It has business value, but isn’t evidence of your organization’s business or legal transactions. And it may not be useful in a week, a month, or a year.

Value added information comprises the largest volume of information retained. Its retention is based on how long it serves its intended need. In the normal course of business, no laws or regulation govern how long this information needs to be retained.

**Non-value information**

Not a record, no business value — what is it then? Some call it *non-value information*, which is simply information that has no value to a company. Examples of non-value information include let’s-go-to-lunch e-mails, pictures of your luau party, expired records.

Even though some records and items of business value become non-value information, remember that they still may contain information of a confidential, personal, or competitive nature, and should be disposed of properly through means such as shredding. (See Chapter 6 for more about secure document shredding.)

Even items originally designated as having business value can morph into non-value information. Records eligible for destruction or deletion and business value information that has outlived its intended purpose are prime examples. The volume of non-value information residing in storage boxes, filing cabinets, and on hard drives and network drives rivals most company’s useful information.

**Grooving to the record retention schedule**

A *retention schedule* is a document that provides direction on how long to keep your records and information.

Arguably, the retention schedule is the most referenced document in your program’s arsenal. The purpose of the retention schedule is to provide employees with direction on how long
their records must be retained in accordance with laws, regulations, and business need. For more information on how to develop a record retention schedule, please see Chapter 4.

Usually, the results of an appraisal (see Chapter 4) are the foundation for establishing a record retention schedule. So if the appraisal is the foundation of your program, the record retention schedule should be considered the cornerstone.

**Fundamentally Speaking**

This section lists and briefly discusses the essential components of a records and information management program. Subsequent chapters will provide further detail on each of these items. (Note that a record retention schedule, discussed earlier in the chapter and in more detail in Chapter 4, is often considered the most fundamental element of a records and information management program.)

**The core function factor**

Most employees don’t consider managing records and information as their core function (although for the records manager it is). Keep this issue in mind when developing your records and information management program.

Education is a must in approaching the development and implementation of a records and information management program. You have to understand the needs, concepts, resources, benefits, technologies, and marketing approaches needed to make and keep it successful. Don’t worry, you can do it! For more information related to education, please refer to Chapter 3.

**Finding your support group**

Like most large corporate initiatives, a records and information management program can’t succeed without support from senior-level management. Support from the top will improve your chances of obtaining cooperation from others — and you will definitely need cooperation from others. For more information on support, see Chapter 3.
Examining the appraisal value

The appraisal process allows you to gain an understanding of your records and information. This includes location, owners, and content. There are different methods for conducting an appraisal involving varying degrees of time and effort. Regardless of the method you choose, the results of the appraisal begin the process for laying your program foundation. For information on how to conduct an appraisal, see Chapter 4.
Chapter 2

Show Me the Benefits!

In This Chapter

▶ Reducing expenses
▶ Improving efficiencies
▶ Managing risks

Being able to show the benefits of an initiative increases success. Although records and information management may be a support function and never considered a revenue generator, an effectively designed and implemented program can reduce organizational expense, improve efficiencies, and ensure that your company is in compliance with laws and governmental regulations.

Giving Expenses a Trim

Office space is expensive. Why use it to store information that is infrequently accessed or not needed at all? Studies indicate that approximately 80 percent of the records and information retained by organizations contain no business value and can legally and operationally be destroyed. Would doing this have a positive impact on your business?

Reducing paper

To begin reducing your company’s records and information management expenses, start by getting rid of what you don’t need.

Don’t just dive in and start throwing things away! You’ve got to be certain that the retention periods for the records have expired, and that they’re not needed for any potential or pending lawsuits or inquiries.
Reducing the company’s volume of paper records and information can decrease the number of file cabinets that you have to buy and use, which results in more space for productive purposes. And retaining only the records and information that you need makes finding things easier — reducing labor expenses.

**Cutting back on electronic storage**

In 1990 personal computers were equipped with 256-megabytes of storage. Today the average laptop has 20-gigabytes of storage. For those who don’t have their calculator handy, this equates to over 80 times more capacity. In the past 30 years, the cost of a gigabyte of storage has decreased at a rate of 33 percent per year. Currently a gigabyte of storage can be purchased for less than $3.

The inexpensive nature of storage is a contributing factor to many records and information management problems. If storage is so cheap, why not keep everything forever? Because the cost of physical storage is only the tip of the iceberg.

Every gigabyte of storage results in additional expense known as **total cost of ownership** (TCO). TCO is the cost of labor, operations (including risk), and equipment to conduct computer backups, maintenance, recovery, and infrastructure support. Studies indicate that the price of storage represents less than 15 percent of the TCO. Eliminating unneeded electronic information will reduce your storage dependencies, thereby reducing your total TCO.

**Looking at the Efficiencies**

Smart management of your records and information increases efficiencies within your organization. You can look for improved customer service, increased staff productivity, and better decision-making. Increasing your organization’s efficiencies doesn’t involve any magic, but does require planning, support, and technology.

**Improving customer service**

When you’re communicating with customers, they expect their problems to be resolved while they’re on the phone or online.
If you don’t have access to their file or the information that’s needed, you risk losing the customer and the revenue associated with their account. A properly developed program can help ensure that your company meets its customers’ needs by having the appropriate information available at your reps’ fingertips.

**Increasing staff productivity**

An already-efficient staff can be helped by an efficient records and information management program. Such a program will decrease the amount of time it takes an employee to find the information they need to do their job.

Employees at every level of an organization file, retrieve, and refile information throughout the day. Creating efficiencies begins by implementing the proper filing systems and eliminating records with no business value. And, don’t just think file cabinets — this also applies to electronic folders.

**Streamlining decision making**

How can improving efficiencies improve decision making? Imagine every employee of a company having access to the right information at the right time to make the best decisions possible.

**Risky Business**

What types of risk does your organization face? Risks come in many shapes and sizes, some expected and some completely unforeseen. Examples of risks include lawsuits, work stoppages, governmental inquiries, disasters, public relations issues, fines, and penalties. Although an effective records and information management program may not prevent such events, it can eliminate some, reduce others, and ensure that your business is prepared to face others.

**Understanding when to keep information**

Appropriate policies, procedures, and enforcements can improve a company’s ability to respond to risks. All risks
have associated records and information that will need to be produced for reference, research, and ongoing business purposes. Having access to this information allows an organization to respond to the matter at hand.

Consistently managing your records and information and following the company’s retention schedule (for more on the topic, see Chapters 1 and 4) help to ensure everything is kept for the appropriate period of time.

Many risks involve records and information that a company must legally and operationally retain — such as contracts, employee files, and financial statements. These records have long-term informational value and potential negative consequences if not managed properly.

**Understanding when to destroy information**

If records and information are needed for risk purposes, why not keep it all forever? Then you’ll know that you’ll always have the information you need, and can respond to any event at any time. Even though the logic appears to make sense, this approach has its own set of risks. For many years, attorneys encouraged clients to keep everything forever just for the reasons mentioned. But a properly researched, implemented, and enforced retention schedule allows companies to destroy records and information once the retention period has passed. The schedule provides organizations with a defensible position if the destruction of records and information is challenged by the government or the courts.

For example, if a plaintiff’s attorney requests that the defendant produce information from 20 years ago, but the information was destroyed in accordance with the retention schedule after 10 years, the organization should not be found at fault for not producing it. However, if the company failed to destroy the information after the retention period expired, the information will have to be produced, which could be harmful to the organization’s legal position. So, get rid of stuff when you should!
Planning, implementing, and maintaining a records and information management program is a significant undertaking that requires cooperation from all departments within a company. The best way to ensure the ongoing success of this initiative is to get support from the highest levels of company management. Without this support, you may find that your efforts gain momentum at first, but quickly fizzle.

To gain support for your program, you have to market it. Because many organizations don’t view records and information management as a core business function such as purchasing, accounting, and sales, awareness must be increased. Marketing your program allows you to create that awareness. Be advised: Once you have support you will have to continue your promotion efforts in order to maintain support.

Creating Your Support Group

To implement a records and information management program, you need senior-level support.
When presenting your case it is important to know your audience. In most cases, senior management will want to know the following: what it is, why it’s important, how it can benefit the organization, what has to happen, and how much it will cost. Being prepared and brief will improve your chances of gaining the support you need. Keep in mind that, depending on the size of your company, support may involve several things. Therefore, make sure senior management understands exactly what it’ll take to make the program a reality.

Make sure you’ve done your homework before you ask the Executive Vice President to accept your meeting request. Education is the first step in gaining support. And don’t expect to spend all day discussing the ins and outs of records and information management — you will have maybe 30 minutes to present an executive briefing. So try to make the best of it.

Marketing Your Program

Marketing your program involves three stages: pre-implementation, implementation, and maintenance. Each phase has a purpose.

Getting started with pre-implementation

This marketing phase will target your company’s senior management in an attempt to get their buy-in. As discussed, it’s important to have their blessing. The success of your program hinges on their approval.

Marketing to this group involves knowing their concerns, removing the technicalities, and anticipating their questions. You’ll not be successful if the important points of your message are buried in a 30-page document — short, sweet, and accurate is what they want.

Moving along to implementation

Congratulations, you were successful! Senior management has said you may go forth and spread records and information management throughout the company. Now what? Although
the top brass has issued a proclamation to cooperate with your efforts, the managers of the company still have to make sure that their daily functions are performed and not significantly interrupted. Your marketing challenge in this phase is to help these managers and their employees understand how a records and information management program can benefit their departments. To help with your efforts, make sure to develop cooperative partnerships with IT, legal, and other departments that can assist with the initiative.

In some cases, you’ll be received with open arms; in other cases you’ll meet stiff resistance. Marketing your program in a “what’s in it for you” manner will increase cooperation. So what benefits can the average department expect to reap from cooperating with you? Well you can help them to find information when they need it, know how long it should be kept, and outline what to do with it when it is no longer needed. Make everyone aware that you’re willing to work with them closely.

**Keeping things going with maintenance**

This marketing phase assumes that a records and information management program is in place throughout your company. However, this doesn’t guarantee that employees have made it part of their daily routine. Your task is to make sure that records and information management occupies a small portion of their grey matter. Communicating that records and information management is an ongoing function that they’re responsible for, and not an annual project or something they do when they find the time will keep up the awareness.

**Looking at Some Marketing Tips**

Continuing to educate yourself on records and information management fundamentals gives you the foundation you need to market your program. Try to become your company’s subject matter expert (SME) and go-to person for all things related to this topic.
Moving with options and phases

Senior management likes to know if options or phased approaches exist to a problem or for an initiative. Options and phased approaches provide management with an understanding of alternatives to spending all the money and effort upfront or whether it can be done in chunks. When you market your program to them, be prepared to discuss these issues.

Keeping the vision

Become familiar with your organization’s vision and direction. Once equipped with this information, determine how your program can be developed, implemented, and maintained to support the company goals.

Bringing awareness

Keeping employees aware of and focused on your program will help ensure success. This occurs through ongoing marketing efforts such as newsletters, posters in key locations, and training sessions.

Succeeding with success stories

Nothing will market your program better than word-of-mouth from a success story. Find an area of the company that is struggling to manage their records and information and apply your program to solve their issues. Then let everyone else know about it.
Chapter 4
Laying the Foundation

In This Chapter
▶ Conducting the appraisal
▶ Developing a retention schedule

In business, ignorance isn’t bliss — it’s risk. In order to manage your records and information, you need to know what you have. Once you know the population of your records and information, you can begin the process of managing them. This chapter helps you figure out what your company has and what to do with it.

The appraisal and the retention schedule are considered the foundations of your program. Many of the other parts of your program, as well as its long-term success, depend on how you approach, plan, and implement these two items. As a reminder, records and information come in two main formats: paper and electronic. The appraisal and the retention schedule can’t be considered complete without reviewing both.

Appraising Records and Information

The process of identifying and documenting your company’s records and information is known as an appraisal. The appraisal provides details about your records and information such as the name, description, and the media format in which they reside, whether they’re vital, and how they’re used. After the appraisal is complete, you can begin developing your records and information retention schedule (which is discussed in detail later in this chapter).
Traditionally the focus of an appraisal has been on the company’s records. However, more organizations have begun to understand the importance of not only identifying and managing their records, but also their non-record information, which often includes information of business value.

Make sure that you prepare for the event. This includes choosing the appraisal approach that best fits your company and communicating the process to each department. Whether you’re part of a small business or a large organization, letting employees know what you’re going to do and when you’re going to do it helps your chances for cooperation and success.

So what information should be documented during the appraisal process? Regardless of the appraisal method used, a core set of information should be obtained. This includes basics like the name and nature of the records and information, whether they’re paper or electronic, their location, whether they’re considered vital, any laws or regulations that the department is aware of that govern their retention, and whether the item is actually a record or a copy of a record.

Develop an appraisal template to be used during the process (see Figure 4-1 for an example). The appraisal template is used to document the records and information that you find. A spreadsheet is a good tool for this task. In most cases, you don’t have to re-create the wheel; you can find one on the Internet. However, if you plan to use a form you find on the Internet, make sure you tailor it to document all the appraisal information you require.

The following sections outline the most common appraisal options. Although some options produce more accurate results than others, none of them is likely to provide a complete listing of your company’s records and information the first time around. Appraisal is an ongoing process. You will find yourself needing to occasionally update appraisals.
Taking an inventory

The inventory appraisal method is the most time-consuming (for the department, you, and your staff) and labor intensive of the options, but provides the most accurate results. This approach requires an in-depth review of a department’s records and information. It involves opening every file cabinet and desk drawer as well as accessing employees’ computers. During this process, your goal is to document a department’s content at the folder level, not at a document level.

A record series is a grouping of like records or information such as invoices from multiple vendors or employee files:

✔ For example, if you open a file cabinet drawer and see a lot of hanging folders, you can assume that each document in the same folder is related. You don’t have to account for every document, but do need to note each hanging folder and the type of information it contains.
The same is true for electronic content — not each file but each main computer folder. If a computer folder is labeled “Invoices,” you don’t have to go through it to make sure that all the items in the folder are invoices.

Have a knowledgeable employee from each department tag along while you’re going through their records. This helps in case you have any questions about the department’s records and information.

**Going through with an interview**

The *interview* appraisal method involves meeting with employees from each department and asking them a series of questions. You don’t need to open file cabinet drawers and computer folders. Instead, this method relies on interviews of a department’s management and staff. This approach requires less time and effort than an inventory, but the results aren’t as accurate. However, the interview option can still be effective, and will allow you to account for most of your company’s records and information.

Use your appraisal form as a guide for your questions: Ask them to tell you about the records and information they have, how they use them, if they’re vital, whether they’re paper or electronic, and how long they keep them.

Your challenge is to get employees to think about the total population of their records and information — to make sure that you capture as much of it as possible during the appraisal process. Get them to think about the things that need to be captured that are “out-of-sight, out-of-mind.” This may take some gentle prodding. File cabinets full of paper are easy targets; it’s the hundreds (possibly thousands) of file folders on the network and employee computers that present the biggest challenge.

Before conducting an interview, find out a little bit about the department and its functions. This helps you better tailor your interview questions.
Quizzing with a questionnaire

When using the questionnaire method, you provide managers with a set of questions and simply rely on them to document all their items. Unlike the inventory and interview methods, you will not be in the department to assist in the gathering of the information.

This appraisal method takes the least time and effort on your part, but the results aren’t as thorough. However, good planning and communication can still provide you with the majority of the information you need.

The questionnaire you develop should be easy for the managers to understand and fill out. You may want to attach a separate definitions-and-instructions page to guide them along. Make sure your questionnaire is properly developed to get what you need.

Getting to Know the Retention Schedule

A retention schedule is a document that provides an organization direction on how long to keep records and information. You can start to develop your retention schedule once the appraisal is complete. The main purpose of the retention schedule is to let employees know how long to keep records and information. Traditionally, retention schedules have focused only on records. However, more organizations are now providing employees with guidance on how long to retain items that aren’t official company records, but have business value. Develop your schedule to account for both.

Some of your company’s records are assigned retention periods mandated by the government. Other records are kept based on how long the organization feels they need them. The retention of non-record information falls into the latter category. Only keep non-record information as long as it serves its business purpose. Items such as spreadsheets, system
reports, and PowerPoint presentations may have initially been of use to an organization, but ultimately the information becomes outdated and can be discarded. Once it no longer brings value to your company, make sure it is securely destroyed. (For more on getting rid of records and information, see Chapter 6.)

**Knowing where to begin**

Use the information you collected during the appraisal process to help create your retention schedule. You need to know what you have before you assign dates. Include information such as name, description, paper or electronic, whether it's vital, retention periods, and any laws or regulations related to retention.

The number of records listed on a retention schedule is mainly based on the size of the business. A small company may only have a dozen or so records listed. However, a large company may have hundreds or thousands of records on its retention schedule. In this case, the records are usually listed by department.

A records management program requires employees to declare their records; this is what provides control and visibility. However, employees create and receive non-record (business value) information many times during the day. It is important to also document retention periods for these types of items in order to prevent the storage of items that don’t need to be retained. Chapter 6 provides details on how to manage this type of information.

**Determining retention periods**

Determining the retention period of records and information involves research. The retention of non-record information is determined solely by the department or business. For records, you need to research laws and regulations. Different industries have different retention requirements, some regulated at a federal level, some at the state or provincial level. This may include laws and regulations such as HIPAA (personal health information), PCI (credit/debit card information), and other personally identifiable information.
Chapter 4: Laying the Foundation

The Internet can provide you with basic guidance in determining the proper retention period. Consult with an attorney, CPA, or with consultants that specialize in records management and retention to make sure that you determine the appropriate timeframe to keep your records.

Retention periods for records are mainly expressed in months or years; however, a small population of your records may require permanent retention. Items that must be kept permanently usually include (but aren’t limited to) information about pensions, company history, insurance policies, real estate, construction, the Board of Directors, and some tax related records.

**New types of retention schedules**

The traditional retention schedule lists all the records that a department has. In many cases, separately listed records are related such as purchase orders, shipping and receiving records, and invoices. Over the past decade, new approaches have emerged in the development of retention schedules such as functional schedules and the big-bucket method. Each method relies on the record series or a grouping of like records or retention periods.

**Function based**

The function-based retention schedule doesn’t list records individually, but groups them as a function. This results in three records being reduced to one — all having the same retention period. The function-based approach reduces the overall number of records listed on the schedule and may make it easier for employees to comply.

**Big-bucket**

The big-bucket method involves creating a schedule based on similar functions and processes, and determining the most common retention periods of the associated records. For example, an Accounts Payable Department may lump purchase orders, invoices, and shipping and receiving documents into a seven-year retention bucket. Though the retention period of each individual record may be different, they all are part of the purchase and payment process. Adhering to a big bucket retention schedule approach will minimize the total
number of records listed on a company’s retention schedule. However, in some cases it will cause certain records to be retained longer than actually needed. It is recommended that organizations consult with their legal department to determine the related risks.

Assigning a retention period in the big bucket style may be easier, but may cause your company to retain records too long. If a record should be retained for at least four years and the only choice available is seven years, then the record will be kept for three years longer than it should be.
Chapter 5

It’s a Matter of Policy

In This Chapter

▶ Determining what to include
▶ Policing the policy

This chapter goes over why you need a records and information management policy, what should be in the policy, things you shouldn’t include, and how to make sure employees are sticking to it. In addition, the chapter provides best practices for keeping your policy updated and how to ensure employee compliance.

Examining Policy Parts and Pieces

Think of the policy as a GPS for your program. It selects the best route and then tells you where to turn and when you’ve arrived. Without good instruction, you might get lost. The same is true for your policy. It provides employees with direction on how to navigate the records and information management program.

Are you prepared to defend and justify your policy? Attorneys are becoming savvier regarding the role records and information play within an organization. Once a policy is implemented, a business and its employees have an obligation to follow it. During a lawsuit, an attorney may attempt to prove that a policy was in place, but employees didn’t receive proper training on how to follow it and that no enforcement of the policy was in place. Because of this, employees should
regularly receive training on the organization’s records and information management policies — and the training should be documented.

Deciding what to include or not to include

A good policy takes planning. What is it that you need to communicate to employees about the program? What you include in the policy sets the course for your results.

The first steps in determining what to include in a records and information management policy involve understanding the overall objective of the program, who it applies to, why it applies, and the goal of each individual part. Many policies contain common sections. These include:

- **Introduction**: What the topic is.
- **Objective**: Why it’s important.
- **Scope**: Who it applies to.
- **Roles and responsibilities**: Who does what.

The quickest way to set your policy up for failure is to include things that are impossible to achieve or enforce. For example, if the policy states that all e-mail is to be indexed and centrally archived within 30 days of receipt, but you lack the software application to do so, then it can’t happen. If you inform employees that each department will be audited for compliance to the policy on a quarterly basis, but you lack the staff to conduct the audits, then it can’t happen. Only include in the policy what you and the organization have the ability to do.

Policies and procedures are different animals. The policy is what you should do and procedures detail how you should do it. Sometimes the line between the two gets muddled. The policy shouldn’t become a procedure. For example, the policy may state that employees are to enter records into the company’s records management software system. The role of the policy is not to provide step-by-step instructions on how to accomplish this; this is the role of the procedure.
Making compliance easy

Polices aren’t optional. This means that the wording of the policy should have an authoritative tone, but avoid coming across as bossy. The goal is to make the point and let the employee see the benefits of complying. Words such as “should” are accepted better than “must.”

The policy should be easy for employees to follow. Using acronyms and records management jargon may cause confusion and make it difficult to get important points across. The best practice is to keep it simple. If you have to use specific terms, provide a definitions attachment with the policy.

Although training may not be listed as a part of your policy, conduct training sessions with employees to familiarize them with the policy and what they need to do to follow it. Training serves an additional purpose; it shows that an effort has been made by the organization to ensure ongoing compliance to the program.

Policing the Policy

Policies are implemented by an organization to help guide employees. How can a company tell whether its employees are on the right course, or if the course needs to be corrected? The only way to tell is to investigate and audit.

Many companies have implemented effective records and information management policies, but have failed to make sure they’re being followed. When a government passes a law they also consider how to enforce it (at least they should!). The same is true for your records and information management policy.

Auditing – the why, how, what, when, and where

Your program has many moving parts, but not all of them need to be audited. Policy enforcement should be based on items that impact company efficiencies and reduce risks. After
these items have been identified, you can then determine how they will be audited.

Records and information management policies frequently include such topics as defining what counts as a vital record and determining when legal holds should be placed, what should be stored on and off site, retention schedules, and destruction approvals and methods. Other items may be included in a policy depending on a company’s needs.

Audits of each area should focus on where the policy informs an employee to do something. The goal of the audit is to make sure they did it, and did it right. So how does an employee know how to comply with the policy? Training and communication. Training is an ongoing process. Employees should be trained regularly to make sure they understand and acknowledge the records and information requirements of the organization.

**Protecting your staff against unpleasant surprises**

No one likes to be caught off-guard. After you determine what should be audited, make employees aware that audits are going to happen, what will be audited, and how they can prepare. A good tool to provide to employees is an audit document, which addresses these issues.

Depending on the size of your company, you may be the one responsible for conducting audits. However, if you’re part of a large organization, you may have the luxury of an internal audit department that can perform them. In either case, audits should be scheduled to allow enough lead-time to let departments prepare.
Implementing your records and information management program is only the beginning of your journey. Now your challenge is to manage and maintain it. Management and maintenance are like housekeeping. Washing the dishes every day rather than once a week makes it easier. The same is true for records and information management.

The volume of records and information received and created each day by companies can quickly become out of control if employees don’t have guidance on how to deal with it. Although the program’s policy provides a framework for managing the company’s records and information, it doesn’t provide detailed procedures about how to do it. This chapter gives you practical guidance and best practices that can help.

Are Drives Driving You Crazy?

The majority of an organization’s information is now electronic and managed by employees, not file clerks. So a company has to rely on employees to know what to do and how to do it. This includes knowing how to manage paper items, e-mail, application data, and files and data on hard drives and network drives.

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Records and information stored on hard drives and network drives pose a huge challenge for your program. Without proper management, these storage locations can become digital graveyards — areas of risk. This happens due to lack of company standards, controls, and audits.

Computers have made businesses more efficient. However, the ways employees use computers can reduce the efficiencies. Computer drives provide convenience and the ability to store a lot more documents than a box can, which is part of the problem. Boxes of records are more visible, and in most cases easier to manage than their electronic counterparts.

Try to make sure that employees are taking advantage of folder structures and proper file naming conventions. When an employee saves a file on their computer, they make several choices: what drive they’re going to use, what folder it belongs in, and how they’re going to name it. The program’s policy can provide instructions to employees on these issues such as what drive to use to save certain information (such as company records), and guidance on how to name files.

**Drives, folders, and files — oh my!**

To improve the efficiency of filing and retrieval, a folder arrangement should be created. Computer folders are very similar to folders in a paper file cabinet. In each case, the folder provides employees a place to file and organize documents. Imagine opening a file cabinet drawer and seeing no folders, just paper. Although you don’t expect this to be the case, it frequently occurs when saving computer files. When you open a hard drive or network drive, you should see folders, not files. Computer folder structures provide the same benefits as paper folders with even more flexibility such as using subfolders to get more specific when you file.

Although you may warn against it, everyone knows that employees will store information on their hard drives. Storing information on a hard drive presents a couple of fundamental problems. In many cases, the hard drive isn’t regularly backed-up and doesn’t provide organizations with the visibility they need in case of litigation. Some vendors provide software applications that provide back-ups to hard drives at
certain intervals to help with recovery in situations such as hard drive crashes and litigation support.

**Naming files properly**

How files are named is very important. Many employees use names and abbreviations that only they or members of their department understand. How many times have you tried to retrieve a file and had to open several documents before you found the one you wanted?

The best way to prevent this is ask that employees name files in a manner that’s easy for anyone to understand. If it’s a chicken, call it a “chicken,” not “chkn,” “poultry,” or “1#4Q32.” Avoid acronyms, abbreviations, and any other hard-to-figure-out names. This allows employees to quickly retrieve the information they need.

**Retaining non-records**

If records have a set retention period, shouldn’t non-records also? A company may do a good job knowing how long to keep its records, but find it challenging to identify and manage the lifecycle of non-record information. The most common approach used to control non-record information involves setting a maximum timeframe for retention. For example, all non-record information older than three years should be destroyed. This assumes that information of this type has probably lost its business value after three years. Although this sounds easy enough, the catch is that you have to rely on employees to do it. Some vendors now offer software applications that will track the company’s non-record information stored on hard drives and network drives. These applications inform employees when the retention period is up so that they can review and delete the information.

**E-mail – Yikes!**

Twenty years ago most companies couldn’t have imagined the impact e-mail would have on their business. E-mail serves as the main contributor to the explosive growth of electronic information. With e-mail has come the challenge of how to manage it.
E-mail isn’t always a record, but the information in the e-mail may be a record. Knowing how to evaluate, manage, and retain the message within the e-mail is what’s important.

**Looking at management systems**

So how can you manage your e-mail? The best way to manage e-mail is to use an e-mail archiving software application. These systems provide the following benefits:

- Back-ups
- Active retention policies
- Better search and retrieval
- Indexing
- Assistance with e-discovery
- Improved compliance
- Storage reduction

Basically, an e-mail archiving system centrally manages all incoming and outgoing e-mails based on rules determined by the business.

Sound wonderful? The reality is that most companies don’t use these systems. They rely completely on the e-mail application (such as Microsoft Outlook and IBM’s Lotus Notes) and employees to manage e-mail. If you don’t have an e-mail archiving application, there is still a glimmer of hope. There are several best practices for managing e-mail without additional technology.

**Determining the business value of e-mails**

The message in the e-mail needs to be evaluated to determine if it is of no business value and can be immediately deleted, or needs to be saved. Messages that are records or non-records that have business value should be saved to the network so they can be backed-up, searched, and retrieved. However, many vendors offer e-mail archiving and management solutions that allow organizations to better manage their e-mail and storage needs. Applications like this allow you to classify...
Encourage employees to review e-mail folders on a regular basis to determine what messages should be deleted. This will reduce clutter, make information easier to find, decrease storage needs, and help to ensure that employees aren’t holding onto information that can be deleted. Check the retention schedule before deleting any message that may be a record to determine whether its retention period has passed.

**Getting to Know the Storage Vendors**

For many companies, the day comes when they realize they don’t have space to store records in their offices, or that the space could be used for something more productive. And many organizations aren’t equipped to store records. Companies need to decide whether they can provide adequate physical protection and the secure access needed to properly manage their records. If they can’t, they may decide to bring in a records storage vendor. This section goes over how to determine if you need to use a vendor to store your records, and how to select the right one.

Before you start shipping records to a vendor, figure out what you need them to store. Not everything taking up office space is a candidate to be stored off-site. The first step is to separate records from non-records.

**Records only please**

Why pay a vendor to store copies and information of no business value? When preparing to send information to a vendor, the best practice is to only send records.
So when should you send your records to a vendor? The *arms-length rule* is a good yardstick. You want to keep records on-site that you frequently need. All records have an active and inactive period. For example, vendor invoices are active from the time you receive and pay them. However, even after an invoice is paid, vendors may say they didn’t receive payment or the payment wasn’t in full. This means that the average active period of an invoice may sometimes last a year. Sending only inactive records to a storage vendor helps to reduce your overall costs because that way you don’t have to pay to have the records sent back to you and then re-stored.

Another rule-of-thumb, if space allows, is to avoid sending a vendor records that have a short retention period. If a record only needs to be kept for one year, then try to store it in your office. The best candidates for vendor storage are inactive records with long retention periods.

Copies can be securely destroyed as soon as they’re no longer needed. Usually their importance to the company has ended by the time you need to send information to a vendor.

*Not all vendors are created equal*

Many companies can store your records, but are they qualified and certified? Even though the records of today are very similar to records of decades ago, the way that they have to be protected, secured, and controlled has significantly changed. Reputable vendors make sure that they have changed with the times.

Laws and regulations controlling health, credit card, and other personal information have changed the records management and storage landscape. Organizations should make sure that they partner with vendors who have received training and certifications to meet these requirements.

In addition, look for other basic requirements when selecting a records storage vendor. Although these may be basics, it’s not a given that all vendors have them, so do your investigating. These include items such as:

- ✔ Smoke and fire detection
- ✔ Sprinkler systems

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If the vendor you’re considering meets these requirements, there is a good chance that your records will be safe and secure.

Understanding Destruction and Deletion

The dumpster out back is no longer an option. The days of throwing everything in the trash or a recycle bin are over. Laws and regulations now control many parts of an organization’s records and information management program. This includes how you dispose of business information.

Privacy laws have set the tone for how customer and employee information must be destroyed. This doesn’t just include paper, but also electronic items. Knowing how to dispose of information can prevent your company from being fined, penalized, and receiving negative brand reputation.

Finding a place for everything

Employees process and handle a lot of information. Every day, companies rely on employees to know how to dispose of it, but have those employees received the proper training and guidance? What goes in the trash, what should go in the recycle bin, and what needs to be securely destroyed?

To avoid employee uncertainty about how to dispose of information, it is recommended that organizations adopt a shred-all policy. This takes the guesswork out of employees’ day-to-day decisions about records, because everything that needs to be discarded is shredded.
Secure shred bins are provided by many recycle and records management vendors. Items placed in the bins are shredded so that the information can’t be pieced back together. The bins come in several shapes and sizes to meet a company’s needs.

Before destroying or deleting any record, make sure that its retention period has expired. In addition, even though the retention period has passed, the record may still need to be retained due to a pending or active lawsuit. The destruction or deletion of records should be approved by all employees that may be involved.

**Staying on schedule**

Records should be destroyed or deleted regularly based on the record retention schedule. The justice system tends to frown on records being destroyed at a company’s convenience. When you create a destruction schedule, this demonstrates a *normal course of business* approach.

Whether you store records on-site or use a vendor to store or shred records, you should keep track of those records that are destroyed or deleted. Vendors will provide a *certificate of destruction* that guarantees that the information that the company approved for destruction was actually destroyed.
Chapter 7
Understanding Document Imaging

In This Chapter
▶ Determining if imaging is a good fit
▶ Evaluating whether to do it yourself or outsource

Remember the paperless office? Although for most companies it never became a reality, document imaging can allow organizations to rely less on paper processing. Document imaging, sometimes referred to as scanning, involves using technology to convert your paper documents to electronic images. Implementing a document imaging program is a big job that requires time, planning, and money. So before you make the leap into imaging, determine whether it's a good fit for your company. This chapter discusses how to determine whether your company will benefit from imaging, what documents should be imaged, and how much it will cost.

Is It Time for an Image Makeover?

Any company interested in document imaging should ask itself what it hopes to gain. Scanning may not be the answer to every problem.

Before deciding to implement an imaging program, take time to evaluate the issues that are causing you to consider this approach. For instance, running out of file cabinet space may be caused by employees not properly managing records. If
they’re scanned, the electronic images may also not be man-
aged, and will still take up storage space. Understanding
what’s causing the pain will help you determine if the benefits
of an imaging program can heal it.

**Imaging benefits**

Document imaging can provide major benefits. It has trans-
formed the way many companies operate. Imaging can get you
out of the paper shuffling business and let you focus on things
that make your company competitive and profitable. Some
benefits of document imaging include:

- Improved employee productivity
- Reduced space needed to store paper
- Improved customer service
- Access to scanned files from remote locations
- Disaster recovery support
- Reduced incidence of lost and misfiled documents

Although there may be a little more to imaging than hitting
the enter key and having a document pop up, imaged docu-
ments provide quick access to information. They eliminate
the need to get up from your desk to retrieve files from filing
cabinets, then having to refile the information, or having to
request records from your storage vendor. Faster access
to information results in better service to customers and
increased employee productivity.

Imaging your paper eliminates the need to file documents in
file cabinets. How many times have you searched for a file or
document endlessly only to discover it was misfiled, or worse,
you couldn’t locate it? Document imaging reduces this prob-
lem through technology. Each imaged document is assigned
classification information known as *metadata* (details about the
document that allow you to search and retrieve it). Assigning
metadata occurs during the index phase of the imaging pro-
cess. In some cases, metadata is entered manually — or it
can be captured automatically by using character recognition
software. In either case, try to put controls in place to ensure
information is high quality.

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Knowing what to image

Some paper documents are better candidates than others. Chapter 6 discusses how records that are infrequently needed should be sent to a vendor for storage. The reverse is true when determining what documents should be scanned. An organization will benefit more from scanning documents that are frequently needed. This approach decreases labor costs associated with paper filing and retrieval, allowing employees to be more productive.

Documents that are frequently used aren’t the only candidates for imaging. Chapter 1 discussed how vital records need to be identified and protected. A good way to protect a company’s vital records is to image them. This provides an electronic copy that can be backed-up.

Although frequently accessed documents usually make the best candidates for scanning, some companies make the decision to scan records to reduce their vendor storage costs. These are usually records that have long or permanent retention periods. But will the cost to image a large number of documents be less than the costs of storage? This is a question you need to answer before deciding the best course of action.

Front-end, back-end, or image-on-demand?

After you decide what documents to scan, it’s time to consider how to get the most out of document imaging. There is more to imaging than running a document through a scanner and receiving a digital image. Three approaches can be used:

✓ Front-end imaging means that documents are scanned before they’re processed. For example, if invoices are imaged before they’re processed and paid, this would be front-end. In this case, either the company’s Imaging Department or a vendor images the invoice and electronically sends it to the Accounts Payable department for processing.

Front-end imaging provides the option of using workflow technology. Workflow is software technology that allows
scanned images to go through a series of steps. In the case of an invoice, workflow can allow the invoice to be electronically matched with the purchase order and shipping and receiving documents. Once these items have been matched, the invoice can be electronically routed to the employee or employees authorized to approve it. Workflow allows many steps to be automated.

- **Back-end imaging** involves scanning documents after a process has been completed. If you decide on back-end imaging, the Accounts Payable department would process the paper invoice then send it to the Imaging Department or to a vendor to be scanned.

  Back-end imaging provides an electronic collection of a department’s documents. Depending on what a company wants from its imaging process, this approach can provide benefits such as quick retrieval of information and reduced storage costs.

- **Scan-on-demand** is a service that some document imaging and storage vendors provide. A customer who stores their paper records with a vendor who provides this service can instruct the vendor to pull documents from a box and have them scanned and transmitted rather than receiving the paper file or the entire box. This approach has several benefits. It provides quicker access to the information you need, and in most cases it is pay-as-you-go, meaning that you only pay for the pages or documents that the vendor scans. This can be a more economical alternative to imaging all your documents.

### Outsourcing versus In-House

Document imaging can be an expensive proposition. You need to consider the volume of documents you plan to scan and purchase a scanner that meets your needs. Document imaging hardware vendors offer multiple models capable of scanning a few pages per minute to production scanners that can image over a hundred pages per minute.

The software needed to capture images is another consideration. Many low volume scanners include a document capture
application. However, most medium to high through-put scanners require the purchase of capture software that may cost thousands of dollars annually. Additional employees may be needed for the document imaging process. This will be based on your planned image volume and how quickly the documents need to be scanned. After you pick out your image equipment and capture software and fully understand employee needs, you can determine whether you need a maintenance contract to make sure your scanner continues to properly perform. This section of the book helps a company decide whether to make the investment in equipment, software, and staff, or to outsource the process.

**Outsourcing your imaging**

Most organizations make the decision to outsource document imaging because they don’t want to invest in the hardware, software, and staff needed to start an in-house program, or they don’t want to get involved in something that sidetracks them from their main business focus.

Many vendors specialize in document imaging services. Some vendors referred to as service bureaus are dedicated to the imaging of client documents. Other vendors such as record storage companies perform scan-on-demand services. Both can provide valuable benefits.

Many storage vendors and service bureaus provide a full range of document imaging services. They can electronically transfer the images and metadata to your company’s network or supply a CD that contains the information. In some cases, organizations will have incoming mail sent to the storage vendor or service bureaus’ post office box so that the information can be imaged and transmitted even more quickly.

Do your homework. Not all vendors are created equal. Visit the vendor’s office. Inspect their equipment, processes, and staff. Some vendors may image your documents then send it to another country to be indexed. Make sure you’re comfortable with how the vendor is planning to handle your company’s information.
Adding up the costs of the in-house option

The cost to image documents is based on the volume of documents to be scanned. The daily volume of documents imaged by companies can vary significantly, and volume controls every part of an organization’s document imaging expense. Here’s what you need to consider:

✓ **Scanners.** The type of scanner you need is based on the volume it has to process within a certain timeframe.

Prices for scanners range from hundreds to thousands of dollars. Each type of scanner has a duty-cycle, which refers to the vendor’s recommended number of images produced per day. Here are average duty-cycle ranges:

- Low-volume (workgroup): 4,000-10,000 images
- Medium-volume (department): 10,000-25,000 images
- High-volume (production): 25,000-60,000 images

✓ **Software.** Most business scanners need to work in combination with image capture software. The cost of software needed to capture an image of a document is usually based on the number of pages that will be scanned.

Capture software enhances the overall imaging process.

You can also consider **optical character recognition** (OCR), which is a process that converts print to searchable text.

✓ **Equipment maintenance.** Equipment maintenance should optimally be performed after a certain number of images are created, or after a certain length of time (preventive maintenance).

✓ **Staff costs.** The volume of documents that need to be scanned by a particular time determines the amount of staff needed. Depending on the amount of imaging a company plans to do, new employees may need to be hired or current employees may need to dedicate part of their time to image documents.
Chapter 8
Six Records and Information Management Trends

In This Chapter
▶ Reviewing records and information management trends
▶ Determining the risks and benefits

New technologies, laws, rules, and regulations are forcing organizations to rethink the way they conduct business. The trends that are discussed in this section either involve the use of technology or how to better manage it.

eDiscovery

eDiscovery means electronic discovery. Discovery is a legal term that involves steps that occur before a trial. Lawyers for both sides meet and request information and documents from each other in an attempt to gather important facts.

eDiscovery focuses specifically on a company’s electronic information. So why is it a trend? The volume explosion of electronic information has made it almost impossible for most companies to manage. Electronic information can be stored in many locations such as hard drives, network drives, software applications, flash drives, CDs, and tapes. Many companies don’t have policies or procedures in place for identifying information that may be relevant.

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Controls should be put in place and standards followed to identify, hold, preserve, process, protect, and produce information that is needed. Many vendors now offer software that helps companies manage eDiscovery. It may be helpful to examine the EDRM model, which you can find online at http://edrm.net.

Computing on the Cloud

Imagine not having to buy another server on which to store your information or not having to worry about backing-up your files. It’s not a dream — welcome to cloud computing. Cloud computing allows an organization to transmit its information securely over the Internet where it’s stored and immediately backed-up. Cloud computing enables quicker deployment times and greater simplicity than on-premises alternatives.

Most cloud computing contracts are based on a pay-as-you-go basis, (a company pays only for the amount of information that they need to store) or have a per-seat (per-user) licensing component in addition to a usage-based component. However, cloud computing isn’t only about storage. Vendors also provide software services on the cloud. This allows companies to build, test, use, and host software on the vendor’s site.

Governing Information

Information governance may sound like a red-tape phrase; however, companies are beginning to understand its importance. Information governance focuses on what a company should do to manage its information — and how it should do so. Plus, it advises on how to hold employees accountable to help out with governing information. If you think it sounds like a policy, you’re correct, but there’s a little more to it.

Information governance involves a team approach made up of members from different areas of an organization such as IT, legal, compliance, records management, and operational management. No one employee of a company understands all the issues related to the management of information. The objective of information governance is to account for all the issues such as eDiscovery, records management, compliance, security, storage, and privacy, and then make sure controls are put in place to properly manage each item. The controls are
then monitored and measured by the information governance team to make sure they’re working.

Looking at Records Management Software

Records management software isn’t new. However, the software has evolved over the years to meet changes in records and information management requirements. Some software only manages paper records, while others may manage both paper and electronic records.

So how does the software work? Its main function is to account for and monitor all your records and their retention periods and retention event triggers. This eliminates the need for employees to track records throughout their life cycles. It also helps companies determine when retention periods are up. To make this happen, you simply supply the software with your records inventory and retention rules.

But records management software can do a lot more than just manage your inventory and retention. It can also place holds on records if they need to be kept for litigation or audit, allow employees to request records from storage, generate listings of records that can be destroyed, and provide management reports.

Advanced electronic records management systems can even allow organizations to manage records that are located in other systems. This is known as federation, meaning that electronic records no longer have to be in the records management software application to be managed.

Mapping Your Data

Many organizations are finding it very difficult to manage the explosion of electronic information. Most large organizations have hundreds of software applications in use. It’s important to know where electronic information is located, its purpose, and who owns it. This is the process of data mapping. Why is it important? One major reason companies decide to complete a data map is due to the changes in the Federal Rules of Civil Procedure (FRCP).
To comply with the FRCP, parties to a lawsuit have to provide each other with a copy or description, by category and location, of all documents and electronically stored information (ESI) that each side has that supports their case.

Data mapping involves conducting an inventory of all the company’s electronic applications in order to document the name, location (mainframe or server name), purpose, what type of information it contains, retention periods of the data, and the department or operation owner.

The process of data mapping is similar to conducting an appraisal for your paper records and information (see Chapter 4).

Many organizations who have tried to complete a data map themselves have found that the project is too big to do alone. Vendors have created software that can assist in the process. In addition, consultants specializing in electronic records and information management can help with data mapping.

**Social Media**

Who would have ever thought something like social media would affect businesses, let alone how it would impact the management of their policies, records, and information?

Most folks are now familiar with Facebook, Twitter, and many of the other social media sites that continue to spring up. They’re now part of how companies and their customers stay in touch. Companies post comments to social media sites informing people of special deals, discounts, coupons, and upcoming events. In return, the public can post comments back to the company, which are viewable by others on the site.

Many of the communications between a company and the public can be considered records that have to be managed (see Chapter 1 for more on records). If a company uses a social media site to offer a discount, which is evidence of a promise to a customer, then it should be considered a record. Social media is an area that is receiving a lot of attention from lawyers. Stay tuned for updates.
Iron Mountain

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