



# RECORDS MANAGEMENT WHITEPAPER



## *Q: What sources exist related to industry best practices for management of records?*

**A:** At the Federal level, The Federal Code of Regulations began standardizing the records and information management aspect of the various codes in Section F, although not all the CFRs have done so.

The CFR pertains to your industry or area of practice, and usually contains a section on records management. That being said, there are some specific retention periods that pertain to all organizations—these include:

- GDPR
- Standards & Educational Resources
- ARMA International
- AIIM International
- MER
- ISO
- ANSI

In California, there are numerous sources of information relating to records management best practices, including:

- CalRIMS
- GSC 30490
- CRPA
- CCPA

There are also industry-specific resources available if you are interested in learning more about records management best practices for each field:

- IOFM – Financial Management
- SHRM – Human Resources
- PMI – Project Management
- IAOP – Outsourcing
- ILTA – Legal Technology
- ALA – Legal Administration
- ASQ – Quality Management



**Q: Are there best practices for electronic records within the context of a program?**

**A:** Best practice is to manage the content of the record—regardless of format. Preservation and disposition methods vary by format and the length of time a record needs to be maintained for retention purposes.

A best practice would be to declare in a policy what the expected format is for long term preservation, taking into account the resources available to ensure the readability of the record in the long term.

Limitations in the past regarding the viability of electronic storage media have led to policies declaring that the official record is paper-based, without taking into account how natively electronic records and databases are preserved. Advances in technology in long-term archival storage have addressed this issue so that the official record can be maintained in electronic format.

**Q: Are there issues in the field currently?**

**A:** A key issue in the field is communicating with employees and third parties as to their responsibilities in preserving the organization’s records appropriately, and, conversely, the appropriate disposition methods in order to:

1. *Protect personally identifiable information*
2. *Ensure a single source of the record as evidence of business transactions and decisions*
3. *Ensure that the information that is retained is authentic, reliable and has integrity*
4. *Follow published procedures in managing records to provide a clean audit trail*

Another key issue is the concept of data mining from enterprise databases and business analysis of the data. A use case for the Organization, for instance, would be in analyzing data about benefits applicants. Unfortunately, in many companies and agencies, the quality of data in legacy systems has led to the postponement or freeze of projects because the data was so inconsistent or corrupted. Tools are available to assist in cleansing the data, but, in many cases, a benchmark or norm cannot be easily identified to standardize data.



“An analysis of the culture first leads to the best approach for an organization.”



## Q: What are the components of an excellent Records Management Program?

A: An excellent program is composed of:

1. **Policy** – A concise statement of employee responsibility in regards to records and information management
2. **Procedures** – How to go about meeting their responsibilities
3. **Technology** – Enterprise tools that protect data, provide a clear audit trail and produce meaningful reports
4. **People** – Computer literate employees who believe that the record is an organizational asset—not their private information
5. **Training** -- “How do I?”
6. **Education** -- “Why should I?”
7. **Compliance** – Periodic internal audits to ensure that employees are doing what they are supposed to do in managing an organization’s information assets
8. **Scheduled analysis and review** – Have changes in regulatory requirements or case law affected the protection or retention of record sets? Are there departments who never send records to archives at all?

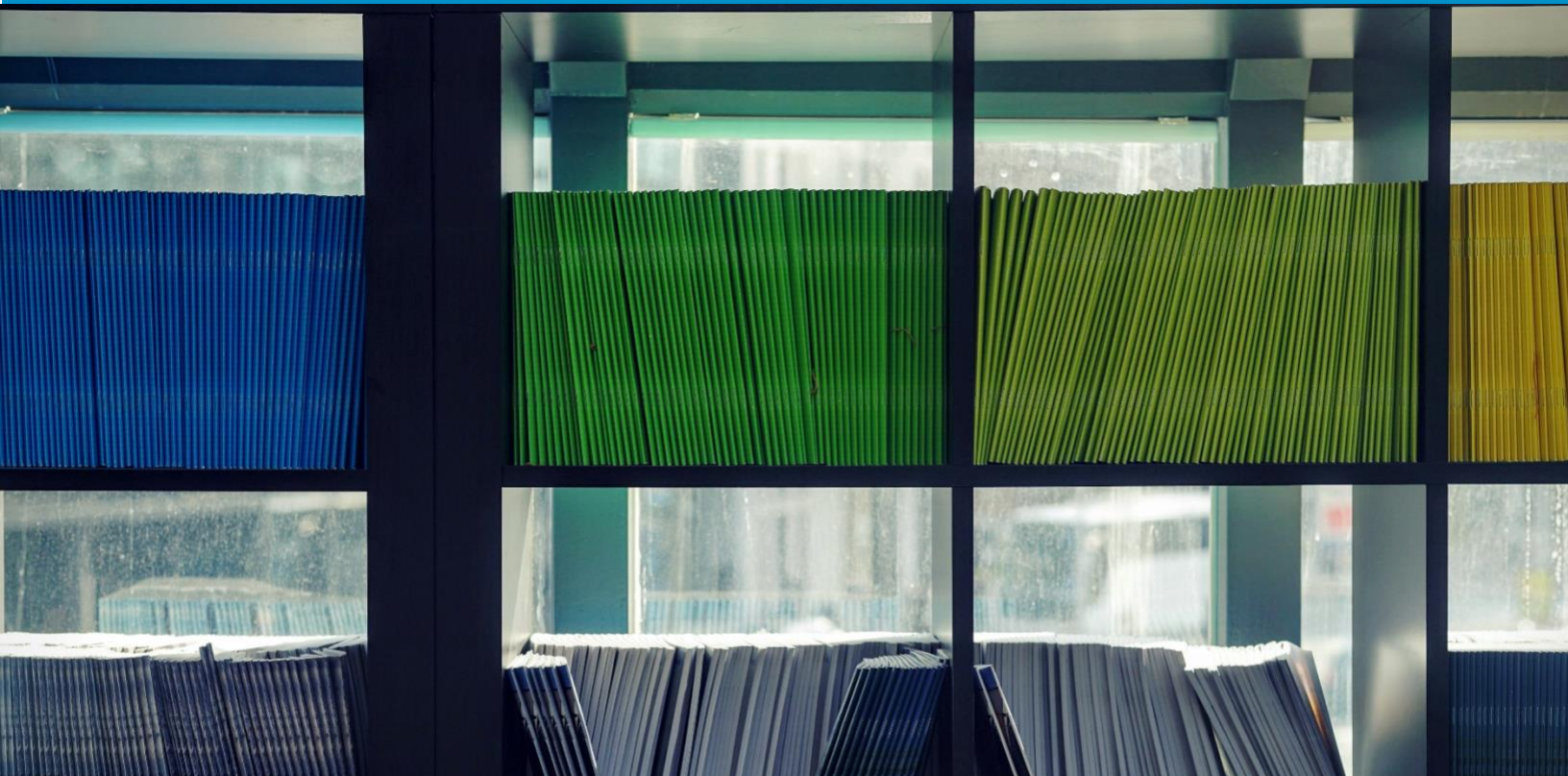
## Q: What is the most significant obstacle pertaining to the development of a successful program?

A: The number one reason most programs fail is a lack of executive support and stewardship. The second is an inventory of the records created and received by the entire organization, which includes the business function of the record—why is it created or received?

The third is understanding secondary and tertiary operational needs in order to determine the longest retention period based on operational needs and comparing them to legal requirements. For instance, does the training department use IT Helpdesk tickets to determine training needs? Does Planning look at the number of speeding tickets in a given area to assist in the placement of speed bumps?



“The number one reason most programs fail is a lack of executive support and stewardship.”



**Q: Is there a “best way” to assess an existing or proposed program?**

**A:** The short answer is no. There are multiple ways to gather information--from objective views of the volume of electronic records, history of certified destruction, interviews with department employees, electronic surveys of records and information usage, software inventories to see what types of applications are in place that could create records, opening closets to see what is stored, opening up desk drawers. An analysis of the culture first leads to the best approach for that organization.

**Q: What is the best approach to needs analysis?**

**A:** When conducting a needs analysis, a review of existing documentation that encompasses procedures, file classifications, file plans, taxonomies, installed systems and the functionality that has been turned on. Additionally, a review of any existing contracts in which a vendor has some responsibility for recordskeeping, tools in place, such as multi-function devices or barcode wands, is done first, offsite.

Then, a questionnaire is created – it may be online, a digital form, a printed-out form – whatever works in the organization’s culture that addresses the employees’ understanding of the program as documented, and, actual practice. Next, onsite interviews are scheduled with key stakeholder departments, including, but not limited to: Police, Organization Counsel, Health Services, HR, Engineering, IT, Records Management, Finance, Treasury, Board of Supervisors and Public Works. The interviews build on the information supplied in the questionnaires. Finally, shadowing of knowledge workers to the extent that privacy laws permit, to see how they find the information they need on a daily basis.

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**Q: What role does auditing play in an ongoing Program?**

**A:** Auditing is critical. You need to know that your employees are doing what you've told them to do using the tools that you have provided. External audits are much less stressful when periodic internal audits are conducted and issues resolved without the threat of fines hanging overhead.

**Q: How should records management fit into strategic planning?**

**A:** There should be a records manager providing input into the plan to ensure that records are gathered, protected and managed for each of the elements in the plan. This ensures transparency of the plan and also ensures that successes in the plan are documented so they can be repeated. This also holds true for failures, so that they can be avoided in the future. Strategic plans with an element of change and growth will more than likely be under close scrutiny and more apt to undergo litigation; having a records manager providing input as to how to preserve the record will cost much less than paying for the consequences down the road.

**Q: Do trusted document requirements affect a Program?**

**A:** When the elements of a trusted system are looked at in detail, they are the elements of ARMA's Generally Accepted Recordkeeping Principles, AIIM/ANSI 2012:25 standard, ISO 15489, all of which speak to the integrity, reliability and authenticity of a record. So, yes, they do affect a Program.

If the trusted document requirements are not met, then it's very difficult to say with confidence "yes, this is the evidence of our decision or action." Birth and death records are maintained in non-editable forms (which could be archival WORM technology for ESI or paper documents with a seal or stamp).



**“Having a records manager providing input as to how to preserve the record will cost much less than paying for the consequences down the road.”**



**Q: What is the best type of training program?**

**A:** A multi-prong approach for new technology and concepts that covers not only the “how to” but the “why” is the most successful and effective. Classroom training for new processes and software applications that are hands-on, not lecture based, are best for adult learners. Refresher courses on a regular basis (every six to twelve months), online, on-demand for new hires or transferees, webinars on very specific topics, such as how to use a single feature in an application are all part of a good training program.

The key is making sure that attestation is included in any of the approaches. Questions that cover each section as it’s presented during the training session as well as a test on the entire topic are recommended. In addition, each student should sign an affidavit that they understood the course material and will follow the instructions while on the job. Learning management systems (LMS) that are interactive and provide attestation are cost-effective ways to report on training efforts.

**Q: Other than legal, what is the most significant difference between private and public sector records management and retention schedules?**

**A:** Public records requests and disaster recovery are two areas for the public sector’s records management needs that are more critical than in the private sector. Redaction requirements in Public Records requests are more complex than most private sector confidentiality requirements. Disaster recovery requires that the most current records be made available to the workers fixing the problem.

Most companies will switch to Plan B while waiting for the government to get things back up and running; those that don’t have a Plan B don’t stay in business very long after the disaster. The local government doesn’t have the option to go out of business and so the obsolete repair records or “as-built” records need to be updated and preserved on a regular basis.



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**Q: What is the best approach to conducting a records inventory?**

**A:** Again, this is a combination approach of questionnaires, interviews and analysis of offsite records. If a records inventory has never been conducted, “feet on the street” may be necessary.

For example, in a records inventory conducted for a local government agency, boxes of infrastructure records were found in a women’s restroom. No women worked for that particular department, and had never worked for the department, but during the initial survey that was sent out electronically, those records had been overlooked. In another instance, half of a floor had not been built out during initial construction and boxes were just stored there. Finding them filled a missing gap of about five years in the agency’s offsite storage inventory.

**Q: Once retention schedules are in place, what is the recommended interval for updates?**

**A:** The recommended interval for updates is every 12 to 18 months.

**Q: How often should an entity monitor changes in the law?**

**A:** There are records retention research programs, such as Retention Manager 3 and Cohasset, that can be purchased for a few thousand dollars per year that will provide updates every 3 – 4 months on legal requirements and legal considerations. Monitoring the legal requirements is only part of the equation when determining retention, however. Operational and historical requirements should also be taken into account. For instance, a particular federal grant may only require records to be kept for five years after the close of the grant, but the grant writer may find that referring back through two grant cycles helps win more grants—so the retention could be 10 years.



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**Q: What information does a vendor need to submit a complete Program proposal?**

**A:** A vendor will need the number of departments, any third-party relationships that the Organization may have that entail maintenance of records (ADP for payroll, for instance, partnerships with other Counties or Special Districts, or Federal agencies providing grants). A holiday schedule so that the project plan can accommodate the employees' time off is also needed, as well as an idea of existing volumes for both electronic and hard copy (in terms of tera or peta bytes). Additionally, the number of shared drives, number of boxes, number of filing cabinets and number of backup tapes in storage, date the last time the retention schedule(s) were updated, existing applications that create, store and manage documents and records, and, that manage litigation.

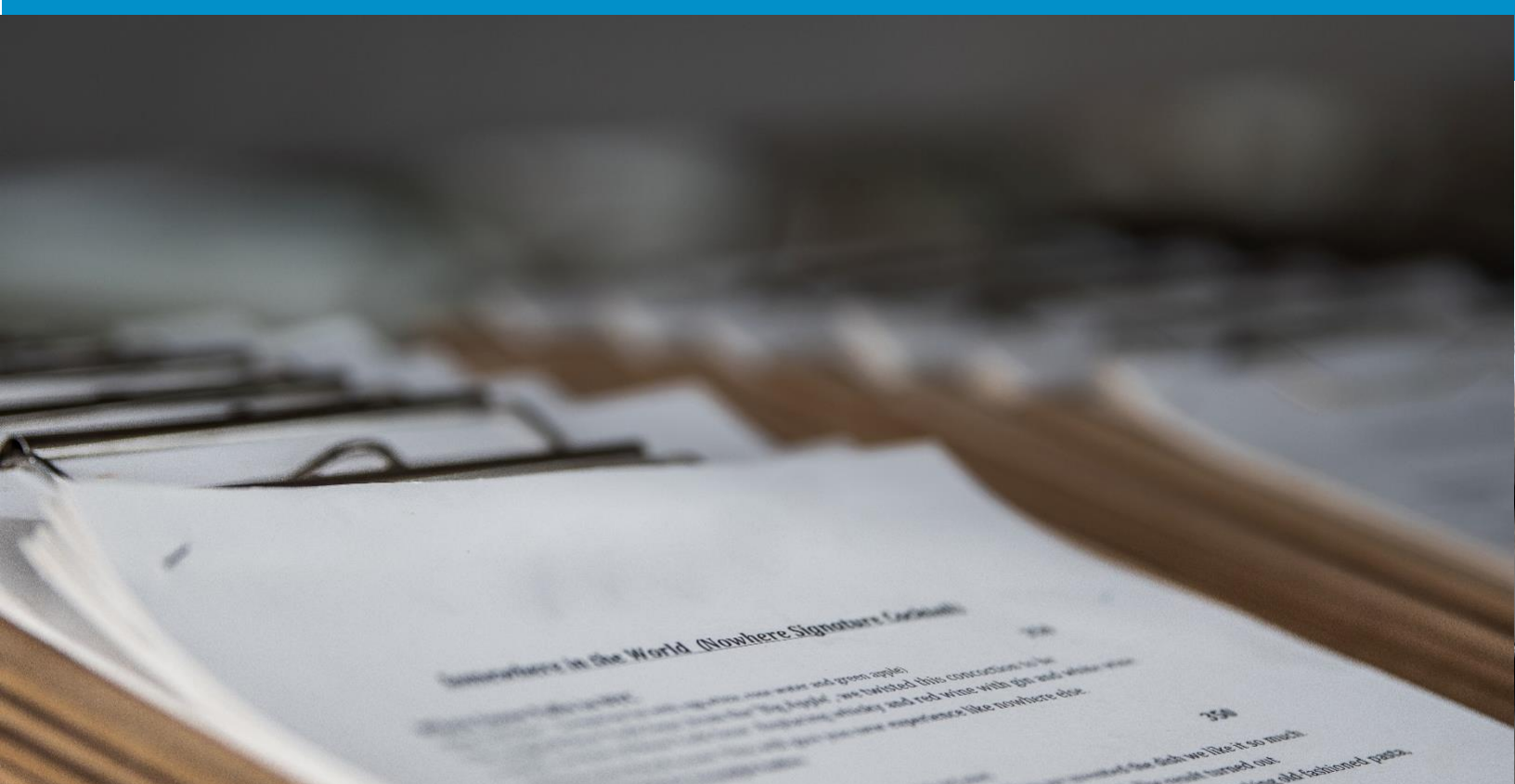
**Q: What is the best pricing methodology?**

**A:** By deliverable:

- Project Plan for the consulting engagement
- Gap Analysis
- Retention schedule
- Policy Statement Draft for Adoption
- Procedures Manual
- Desktop Instructions
- Training Curriculum
- Recommendations for the future
- Roadmap for the recommendations



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**Q: How long is needed to develop and implement a Program in a large Organization?**

**A:** At the most optimistic, 18 months. Realistically, three years to inventory, research, present for approval, create procedures, desktop instructions and perform the initial training with the development of on-demand, online training curriculum.

**Q: Are there generally accepted phases for a program?**

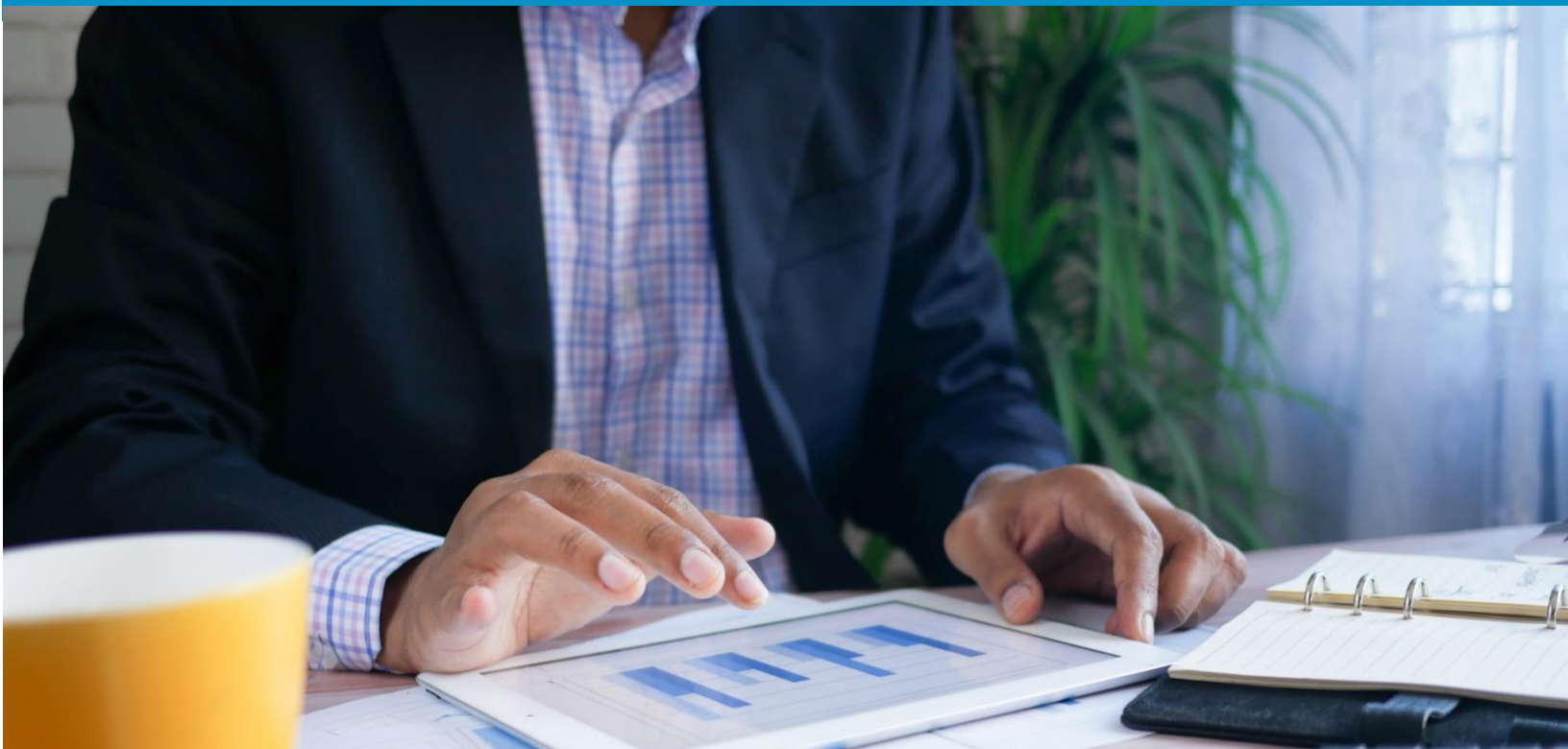
**A:** Creating a program has been defined in the sections above. Implementing and maintaining a program require ongoing attention and support to ensure that it is executed and overseen by management. Because records management touches all departments and a record can have a lifecycle across departments, phasing a program in one department at a time doesn't work well. It is usually more effective to make sure that the tools to manage records are in place and tested, then roll it out in a focused effort that may take two to three months to reach all departments.

**Q: What role should a consultant continue to play after a Program is established and the initial contract concluded?**

**A:** A consultant can serve the Organization by providing audit services to make sure that what was implemented is continuing to be executed. If the Organization chooses to not subscribe to a retention research program, an annual review of retention requirements is best handled by a consultant due to their expertise and focus. The consultant can also provide a resource for ongoing training if a training program does not exist within the Organization.



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**Q: Which value-added services might vendors offer for Program development?**

- Learning management systems for online, on-demand training.
- RFP development and creation.
- Technical and functional specification review of proposed software purchases to ensure that records management requirements are there.

**Q: Are there commonly overlooked operating considerations?**

**A:** Secondary and tertiary uses of records, audit requirements and ease of management. Retention schedules with thousands of records series are too cumbersome to manage well. Taking the time to determine the business reason for the record to exist and assigning retention periods based on function rather than title leads to more manageable programs.



“Retention schedules with thousands of records series are too cumbersome to manage well.”

