

MANAGING RECORDS IN MULTIPLE REPOSITORIES

The gorilla in the room is compliance. Or maybe it's a giant octopus, spreading out tentacles in every direction to suck in documents for a court case or a government audit. How can you make sure this octopus reaches every possible piece of information that is needed, from every possible repository? Faced with this situation, how can you protect your records management program from being noncompliant, as well as from the high cost of doing multiple searches into separate repositories or disparate content silos?

The answer to this situation is called enterprise records compliance by some or federated records management by others. Its proponents say that one universally managed system would be best, a system in which records are managed centrally but left in their native repositories.

The benefits, according to Judith Lamont, Ph.D, writing in KM World, May 1, 2008, are that records stay where they are and are virtualized so they can be put under retention rules or put on hold when necessary. Most companies have records, both paper and electronic, scattered in several allocations and find it is not feasible to get such records relocated into one place.

This, then, seems to be a good, centralized solution. However, in addition to the pressure of compliance and discovery, there is also the necessity of dealing day to day with documents in both electronic and physical form as to retention and disposition, and possibly the need for migration.

Although electronic documents are universal now, there are many documents that must be produced and retained on paper, such as signed contracts or certain legal recordings, even though they can be converted to electronic images.



So how many repositories are we talking about?

In 2005 AIIM conducted an Industry Watch Survey which showed that 54 percent of respondents had six or more repositories. As explained by vendor MDY (now merged with CA Records Manager), repository systems can include email, archiving, document management, extranets, imaging and content management.

In contrast to these general categories, there can be separate departmental repositories with very specific functions that enable a department to do its work. Obvious examples are systems for accounting or other financial functions with repositories that are not easily blended into a single system. It is not always feasible for an organization to break down and replace these content silos because the process is disruptive to business.

Furthermore, a company that plans to grow by merging with another entity, or acquiring it outright, knows that such corporate actions will bring a new crop of repositories into the picture with an enlarged need for enterprise-wide control (www.ibm.com/software/data/cm/cmgr/rm, "Managing Electronic Records Across the Enterprise").

What is the main benefit of centralized management?

“The major driver is compliance,” according to Craig Rhinehart, director of compliance and discovery for products and markets at IBM ECM. But a beneficial side effect may be cost savings from not having to maintain multiple repositories. Although one benefit of federated management is being able to leave records within an established repository while also making them part of the centralized system, there are times when migration is necessary. If an organization wants to reduce its number of repositories, it may choose to migrate records to a central location. Sometimes records must be migrated because their native repository cannot accept and accommodate a necessary records management policy.

Two frequently-mentioned selling points for enterprise-wide compliance or federated management are the ability to do a discovery search across all repositories to find relevant records, and to search all repositories for records which have reached their disposition date, regardless of location, regardless of media, so that they do not become liabilities.

Another benefit identified by Reed E. Irvin, vice-president for product management at CA Records Manager, is that information now existing in a non-managed way can be brought into the fold and, if appropriate, classified as records which may prove to have business value.

Unified vs. Federated

What’s the track record for each?

It’s point/counterpoint for managing information as evinced in two recent articles on ARMA’s web site, available for free. Reed E. Irvin (see above) wrote “Getting from Point A to Point B: What It Means to Take a Federated Approach” (www.arma.org/imm/MayJune2009). Coming back with other information, consultant Preston W. Shimer, FAI, wrote “Unified vs. Federated: Which Has the Proven Track Record for Managing Information?” (www.arma.org/imm/NovDec2009).

Reed states that the term “federation” is actually a method by which applications talk to other applications. In the information management world, the term is used for the ability to access information and communicate between disparate content silos, to have it “governable under one umbrella.”

In Reed’s view, a federated solution “should help an organization accomplish and stay ahead of the Electronic Discovery Reference Model, the standard for e-discovery.

To do this, the organization must be able to find information immediately with a search that is total and accurate. This provides “the right information to the right people at the right time” to make critical business decisions.

Preston W. Shimer’s article addresses the unified approach and the federated approach. The unified approach establishes a central repository where all records are retained, managed, referenced, and disposed of in accordance to retention and disposition requirements.

In Shimer’s graphics, three circles represent business units, each creating records and using them to achieve objectives, operating under a schedule that determines which records are to be sent to the central repository, and which can be kept briefly at the business unit and then disposed. All records move toward the unified repository.

To define the federated approach, he quotes Judith Lamont (see second paragraph of this article.) Here the three business units create records and retain all e-documents. Each unit sends index information to the control center and repository.

E-docs are kept according to retention policies and are disposed when directed by the control center. The federated index is used to search throughout the network and retrieve information.

What are the disadvantages of each?

The unified approach, which is historically old, has this disadvantage. It relies on human judgment to declare a document is a record, and that related supportive papers should or should not accompany the record. Because the numbers and costs of human workers are obvious, they are susceptible to budget cuts while the benefits of good records management are not measured.

Conversely, the federated approach is viewed as technology that will recognize documents that are being created anywhere, and will set rules for retention and disposition with no help from humans.

Federated technology will use software algorithms to determine a document has become a record. The overall goal is to automate the human judgment and discipline that can make record keeping work properly.

In Shimer’s view, the federated approach does not have a track record and thus is viewed as a “project” that will reduce payroll costs and have a future payback. He states that problems begin during implementation when it becomes obvious that this complex organizational undertaking requires myriad instances of judgment and discipline that cannot be performed by computers.

That said, technology for records and information management keeps hurtling forward to solve the problems of both the unified and federal approaches. Talk to your storage provider to get information on pros and cons of each.

ARMA International Releases Three New Guidelines for Information Management

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(Vocus/PRWEB) November 25, 2009 -- Standards, guidelines, and technical reports are designed to create a professional best practice environment within an organization. ARMA International continuously releases new and up-to-date guidelines to keep information management professionals current on these best practices in growing industries, professions and technologies. Following are the latest additions to the ARMA International Standards and Best Practices family:

Website Records Management Guideline:

This guideline explores how information posted on websites may constitute records. It offers records and information management (RIM) advice and best practices recommendations for managing website records. It covers roles, responsibilities, and risk management for website management, including website lifecycle issues, technologies for creating and attaching metadata, web content management, capturing and harvesting website data, and meeting the challenges of Web 2.0.

RIM for IT Professionals Guideline:

Electronic commerce, emerging technologies, privacy and security requirements, and other business drivers are requiring RIM and IT professionals to join forces. This guideline is designed to help RIM professionals extend their IT knowledge while assisting IT professionals in gaining a clear understanding of records retention and archiving requirements and methodologies. It provides guidance for professional collaboration between records managers and IT to create cohesive information management solutions.

Contracted Destruction for Records and Information Media:

Designed to guide organizations when contracting for destruction services, this guideline identifies the critical components that must be addressed so no records or information in any format are compromised during any part of the destruction or process. For service providers, this guideline will create an understanding of the requirements for managing and processing an organization's records and information media destruction activities.

HHS Promises \$80 Million to Support Health IT Workforce

David Blumenthal, M.D., the U.S. Department of Health and Human Services' (HHS) national coordinator for health information technology, announced plans to make available \$80 million in grants to help develop and strengthen the health information technology workforce. The grants include \$70 million for community college training programs and \$10 million to develop educational materials to support these programs. Both programs will support the immediate need for skilled health information technology (health IT) professionals who will enable the broad adoption and use of health IT throughout the United States.

Authorized by the American Recovery and Reinvestment Act (ARRA), the grants are the first in a series of programs to help strengthen and support the health IT workforce. Additional details regarding the grant programs for these and other key resource and training areas will be announced in the near future.

"Ensuring the adoption of electronic health records (EHRs), information exchange among health care providers and public health authorities, and redesign of workflows within health care settings all depend on having a qualified pool of workers," said Blumenthal. "The expansion of a highly skilled workforce developed through these programs will help health care providers and hospitals implement and maintain EHRs and use them to strengthen delivery of care."

The community college program will establish intensive, non-degree training that can be completed in six months or less by individuals with some background in either healthcare or IT fields. Participating colleges will coordinate their efforts through five regional consortia that span the nation. Graduates of this training will fill a variety of roles that assist healthcare practices during the critical process of deploying IT systems and support these practices on an ongoing basis.

The curriculum development program will make high quality educational materials available to the community colleges so these training programs can be established quickly to meet the workforce needs.

Any U.S. non-profit institution of higher learning currently engaged in providing training in health IT that is interested in drafting curriculum or establishing a consortium that includes community colleges may apply for the grants. Information about grant applications will be available soon at <http://healthIT.HHS.gov/HITECHgrants>.

House Passes Data Breach Bill

On December 8, the U.S. House of Representatives passed the Data Accountability and Trust Act (H.R. 2221) via voice vote. The measure has been sent to the Senate for consideration.

Sponsored by Rep. Bobby Rush (D-IL), the legislation:

- Requires the Federal Trade Commission (FTC) to promulgate regulations requiring each person engaged in interstate commerce that owns or possesses electronic data containing personal information to establish security policies and procedure.
- Authorizes the FTC to require a standard method or methods for destroying obsolete, non-electronic data.
- Requires information brokers to submit their security policies to the FTC in conjunction with a security breach notification or on FTC request.
- Requires the FTC to conduct or require an audit of security practices when information brokers are required to provide notification of such a breach.

Further, the bill requires information brokers to:

- Establish procedures to verify the accuracy of information that identifies individuals.
- Provide to individuals whose personal information it maintains a means to review that information.
- Place notice on the Internet instructing individuals how to request access to such information.
- Correct inaccurate information

The measure directs the FTC to require information brokers to establish measures that facilitate auditing or retracing access to, or transmissions of, electronic data containing personal information and prohibits information brokers from obtaining or disclosing personal information by false pretenses (also known as "pretexting").

On the House floor, Rush stated the following about the legislation:

"Bill H.R. 2221 addresses data breaches by requiring 'for profit' entities holding data containing people's personal information to have reasonable and appropriate security measures in place to protect that data. H.R. 2221 would also require them to notify consumers, who are U.S. citizens or residents, and the Federal Trade Commission when a breach occurs.

For the past five years, the Privacy Rights Clearinghouse contends that nearly 340 million records 'containing sensitive personal information' have been 'involved in security breaches. High-profile data breaches have plagued financial institutions, nationwide retailers, online merchants, information brokers, credit card processors, health care institutions, high-tech companies, research facilities and government agencies.

"Currently, several laws address data security requirements for narrow categories of information or specific sectors of the marketplace. These laws include the Gramm-Leach-Bliley Act ("GLB Act") Safeguards Rule, which contains data security requirements for financial institutions, and the Fair Credit Reporting Act ("FCRA") Disposal Rule, which imposes safe disposal obligations on entities that maintain consumer report information. In addition, the FTC has used its enforcement authority under the FTC Act to bring actions against companies that have made misleading claims about data security procedures or who failed to employ reasonable security measures in circumstances causing substantial injury. However, there is no comprehensive federal law that requires all companies that hold consumers' personal information to implement reasonable measures to protect that data. Also, there is no federal law that requires companies that experience a data breach to provide notice to those consumers whose personal information was compromised. Those entities, who determine that there is no reasonable risk of identity theft, fraud, or other unlawful conduct, would be exempt from providing nationwide notice to affected persons under H.R. 2221.

"The DATA Act establishes a rebuttable presumption in the law that encryption-based technologies and methodologies adequately meet the determination standard in Section 3, subsection (f)(2)(A) of the Bill. More narrow exemptions are provided for a defined category of personal information holders known as "service providers," in addition to information brokers who handle protected data, but only for the limited purposes of preventing fraud. In promulgating the regulations under this subsection, the FTC may determine to be in compliance any person who is required under any other Federal law to maintain standards and safeguards for information security and protection of personal information that provide equal, or greater, protection than H.R. 2221."

The legislation passed with bipartisan support. The Senate is considering a similar measure, the Personal Data Privacy and Security Act of 2009 (S. 1490).

Did you know...

In addition to several other storage, scanning, protection, shredding and destruction services - Benson Records Management provides the following:

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- Backfile Conversion (Imaging)
- X-Ray Destruction - paying you for your old x-rays?

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When you request that we pull a hardcopy paper file from document storage, we pull the file, scan it, and make the digital copy available to you remotely so you can view it from your location. From that "day forward," you will always have digital access to that file.

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- Media Destruction
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- Hard Drive Shredding
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