BENSON RECORDS MANAGEMENT CENTER

Securing your files and data

A Service of Benson Records Management

December 2009

APPLYING A PAPER-BASED RECORDS PROGRAM TO DIGITAL RECORDS

It is a given that information is increasingly being produced in electronic format rather than paper. However, paper is still being used because it is a way to present information that anyone can understand, with or without a computer. This is especially pertinent in many exchanges of information with the public.

It is also a given that the public is becoming more aware of records and information and how these can affect their lives. The timelines for organizations to produce records are getting shorter, certainly in the legal field concerning discovery. Or when an organization must respond to a FOIA (Freedom of Information Act) request. On during a customer service instance in which a company employee is expected to be able to access a customer's account within a few seconds.

All of this is pushing companies, governments, organizations to go electronic with the creation and management of new records, and to bring their paper legacy records into an electronic system as well, generally called ECM or Enterprise Content Management.

One theory relative to this effort is the "big bucket" idea which has been much discussed in recent years. Its premise is to reduce the number of electronic record retention categories ("buckets" identified by similar business processes or legal requirements) so that employees have fewer choices to make in determining where a record should be filed. As described by its adherents, the big bucket method generally improves access times and lessens the time staff must spend on figuring out where to file a particular record.

One drawback is that if records with various retention times are put in the same bucket, then all records must be kept for the length of the longest retention period.

One participant in the records management listserve saw it this way. If records are kept longer than their normal retention time, and are low risk, the only cost is for more storage and a larger search universe. However, if these are high-risk records, holding them longer than their minimum period may become risky and costly.

There is also concern about going into a very large bucket to find a particular record, as in the discovery process. Also, problems arise when time-driven retentions ("destroy after five years") are bucketed together with event-driven schedules ("upon termination of employee," "when this equipment is sold or taken out of inventory").

Paper to Electronic is Not a Quick Undertaking

Experts agree that this major changeover will take time. It must have the support of upper management. Ideally, there should be a sound and comprehensive records management program in place to form a base for this operation, and there should be strong support for the concept of good recordkeeping throughout the organization.

The process should start with conversations with end users to find out how they currently classify records.

These conversations are also a way to build commitment for an ECM program. What information does each end user get from records? How does this apply to his or her responsibility? Are these records relevant to risk management? Is this customer information that will help a staff person build an advantage over market competitors? How can EMC make the end user's job easier?

These discussions will help the ECM proponent (presumably you, the records and information manager) determine an SEI communication plan for the program: sell, educate, implement. These chats can also help you identify and formulate the content of messages that will help end users, managers and others understand how this program will benefit them and how they can make it work.

In developing a strategy and objectives for your ECM program, you will need to build in measuring points that can show success, or where objectives are slipping away, or areas in which adjustments are needed. Since implementing an ECM program is a long term venture, progress reports along the way must be part of the plan. Experts in ECM also advise that you should not choose your new technology first and then create a strategy for it. Rather, as you methodically work through the steps above, you will likely make discoveries that will help you better define what the new technology should do.

ECM Can Assist with Compliance

For regulated industries, ECM is a necessity but it won't accomplish everything that makes a business compliant. It can track documents, but it is the underlying business processes, standardized and codified to produce these documents, that bring about compliance. Your ECM software cannot be certified as compliant; it is only part of the total environment.

Not every ECM document is necessary for compliance. There are many types of documents that do not have to be part of the compliance process and that would not be examined in an audit. This is why current and thorough records management policies are important including retention schedules. ECM ensures consistency and automation which are critical to compliance. Go to www.aiim.typepad.com/aiim_blog, June 14 and 17, 2009, for more information on ECM strategies and regulatory compliance.

Can Software Manage Both Paper and Electronic Records?

Audits, discovery, compliance and everyday operations force attention upon ECM and ERM (Electronic Records Management). But paper records continue to be with us, much of them retained because of long-term legal and regulatory mandates. John T. Phillips, CRM, CDIA, FAI, writes about selecting software to manage both paper (p-records) and electronic (e-records).

When a query is made for particular information, it matters not whether it is paper or electronic. What matters is that all relevant information is retrieved, with accuracy and speed. To avoid two searches, the ideal would be if the file plan and indexes to documents in all formats could be searched through one database query and one retrieval interface. Software vendors have responded to this need with browser-based query interfaces.

Metadata is important to both formats (author, date of origin, title, description) but the filing, storage and retrieval becomes quite different as electronic files undergo auto-classification based on metadata and content analysis, automatic application of retention schedule and data format standards.

Other differences that must be overcome to have an integrated file plan include determining when/where retention rules will be applied. For paper, they are usually applied at the box level. For electronic records, they are often applied at the disk directory/folder level.

Differences in document security and retrieval procedures will need to be reconciled as well. There are different steps to go through to obtain a record from an electronic depository than those taken to get a paper record retrieved from central files or offsite storage. A paper records management system will send an overdue notice for a file. This is not likely to happen with electronic records. A disaster recovery plan will probably not have copies of paper records sent to several locations for protection. But this is commonly done with multiple copies of electronic data being sent to different locales to protect them from a natural disaster.

It is not impossible to have both paper and electronic records under one system that provides accurate, complete and fast retrieval. Phillips' paper carefully identifies some of the hurdles that must be overcome to make it work. If you are considering an ECM program, talk to your storage contractor for information that will get you started.

2009 Cohasset / ARMA International Electronic Records Management Survey Findings Released

The Executive Summary of the Cohasset / ARMA International 2009 Electronic Records Management Survey: Call for Sustainable Capabilities is now available. Some highlights of the survey include:

- The continuing improvement of records management programs
- For most organizations, much remains to be done to achieve credibility and consistency in the life cycle management of their electronic records
- The processes and systems for handling records via electronic archiving and backup media and devices continue to represent major organizational risks
- There is a persistent accountability gap for electronic records
- Shortfalls in retention and disposition protocols applied across the spectrum of ESI may jeopardize the future reliability, availability, and trustworthiness of many records

The overall findings strongly suggest that, since the last survey, some foundational components of records management programs have received much needed attention. The complete report is free and available to download from Cohasset's RIM Education portal at www.rimeducation.com/survey.php.

ARMA International (arma.org) is a not-for-profit professional association and the authority on records and information management.

Formed in 1955, ARMA International is the oldest and largest association for the records and information management profession with a current international membership of approximately 10,000.

ARMA International provides education, publications, and information on the efficient maintenance, retrieval, and preservation of vital information created in public and private organizations in all sectors of the economy. ARMA International also publishes Information Management magazine. www.arma.org

Cohasset Associates, Inc. is one of the nation's foremost management consulting firms specializing in records and information management. For more than forty years, Cohasset has served clients throughout the United States. Its distinguished work and innovative concepts have been recognized with the highest professional awards.

Cohasset also is widely known for its excellence in education – organizing and presenting the National Conference on Managing Electronic Records (MER) – with its special focus on the legal, technical, and operational issues of managing electronically stored information. www.cohasset.com

Social Media Use Raises Compliance Concerns

According to the "2009 Ethics & Workplace Survey" conducted by Deloitte LLP, a mere 22% of executives say their companies have formal policies regarding employee use of social networking tools. Yet, compliance officers interviewed for a Compliance Week article stressed the importance of putting such policies in place as a way to mitigate publicity risks and prevent damage to brands arising from employee posts.

Existing policies for e-mail may not go far enough in dealing with issues unique to social networking. For Facebook, MySpace, Twitter, and other social media, transparency and integrity are concerns. What an employee says can affect how the company is perceived. For example, if an employee posts positive information about his employer's product, he needs to identify himself as someone with a vested interest. Also, employees must be sure that their posts don't violate their company's code of conduct or its privacy, client confidentiality and intellectual property policies.

One main difficulty is that personal and professional identities merge on social networking sites. According to the New York Times, more time is now spent on social networks than e-mail, and some estimate that sites like Facebook now have 200 million users. Banning use of the tools simply will not work because employees can access them from any computer, not necessarily just their work computers. In industries like financial services where employee communications are regulated as records, there is a need to ensure oversight of social media communications. According to one lawyer that represents financial firms, tools like Twitter give users the ability to send messages to thousands of people. As happened with e-mail, tools to save Twitter messages are already appearing from document management and software vendors.

Technology companies IBM and Intel have published policies for employee use of social media. IBM's policy (www.ibm.com/blogs/zz/en/guidelines.html), crafted by its own employees, stresses personal responsibility and urges employees to identify when they are speaking for themselves rather than IBM. The guidelines also urge respect for copyright, confidential, or proprietary information and the audience who will read the posts. Intel's Social Media Guidelines (www.intel.com/sites/ sitewide/en_US/social-media.htm) urge employees to be honest, stick to their respective areas of expertise, and post information of value. Intel's rules focus on behavior, including the need to disagree politely and to pause before posting.

Unfortunately, some social media policies may fall on deaf ears. According to the Deloitte survey, 24% of the 2,000 people surveyed did not know if their employers had a policy for social network use. Another 11% believed that their company had a policy but did not know what it was.

HHS Issues Rules on Medical Record Breaches

According to an August 19, 2009 media release from the U.S. Department of Health and Human Services (HHS):

New regulations requiring health care providers, health plans, and other entities covered by HIPAA to notify individuals when their health information is breached were issued today by the HHS. These 'breach notification' regulations implement provisions of the Health Information Technology for Economic and Clinical Health Act, passed as part of American Recovery and Reinvestment Act of 2009.

The regulations, developed by the HHS Office for Civil Rights, require health care providers and other HIPAA covered entities to promptly notify affected individuals of a breach, as well as the HHS Secretary and the media in cases where a breach affects more than 500 individuals. Breaches affecting fewer than 500 individuals will be reported to the HHS Secretary on an annual basis. The regulations also require business associates of covered entities to notify the covered entity of breaches at or by the business associate.

In a nod to compliance, the release also noted, "Entities subject to the HHS and FTC regulations that secure health information as specified by the guidance through encryption or destruction are relieved from having to notify in the event of a breach of such information."

8 Reasons You Need a Strategy to Manage Information – Before It's Too Late

AIIM President John Mancini announces the release of the first in a series of e-books focused on the information management challenges facing organizations. 8 Reasons You Need a Strategy to Manage Information -- Before It's Too Late contends that the strategic imperative to manage information effectively will soon become irreversible -- with devastating consequences for those who assume it is otherwise.

"The sheer quantity of information that is descending upon our organizations is rapidly creating a set of circumstances in which we will no longer be able to just ignore this problem," notes Mancini. "As our employees reach outside the firewall to access critical expertise, networks, content, and markets -- and as we simultaneously require 365/7/24 availability -- the lines between what is 'organizational' and what is 'personal' are becoming meaningless."

8 Reasons You Need a Strategy to Manage Information -- Before It's Too Late is a compilation of the best information management columns from the popular 8 Things series in the Digital Landfill blog www.aiim.typepad.com. The free e-book can be downloaded at -- www.aiim.org/8things.

"It's not unrealistic to think that our employees -- who currently say they are overwhelmed by the volume of information they must manage and who currently say they spend hours each day just dealing with email -- will need to manage 10X as much information in the near future," continues Mancini. "How will they handle this tidal wave? Simply extrapolating the current tools and approaches to deal with this tidal wave will not solve the problem. A new approach is needed. And yet many organizations are frankly in a state of 'they don't know what they don't know' when it comes to their information management capabilities."

The 8 Reasons are as follows:

1. A tidal wave of information.
2. Ubiquitous computing.
3. Social everything.
4. Collaboration without governance is a disaster.
5. The era of simplicity.
6. The Tree-Hugger's time has come.
7. You can no longer do this manually.
8. Mismanagement risks are rising.

Mancini concludes, "There is a commercial for car repair where the mechanic says, 'You can pay me now, or you can pay me later. But you will pay me.' The information management landscape is changing quickly and dramatically and the stakes of getting it wrong are rising. Now is the time to finally create and implement a strategy to treat your organization's information as a critical business asset."

About AIIM

AIIM (www.aiim.org) is the community that provides education, research, and best practices to help organizations find, control, and optimize their information. The AIIM community has grown to over 65,000 professionals from all industries and government, in over 150 unique countries, and within all levels of management including senior executives, line-of-business and IT.

For over 60 years, AIIM has been the leading non-profit organization focused on helping users to understand the challenges associated with managing documents, content, records, and business processes. Today, AIIM is international in scope, independent, implementation-focused, and, as the representative of the entire enterprise content management (ECM) industry - including users, suppliers, and the channel - acts as the industry's intermediary.

Purge Year-End. Prepare for 2010!

It's that time of year to look back at 2009. Where did the time go? Throughout the year, you probably held on to documents with some sensitive information.

Call Benson Records for your 2009 Document Storage and Shredding Services to protect your Confidential Information.

Did you know that keeping documents and archives beyond retention requirements can compromise your business and personal security? With Benson Records Management Center, you can have that information protected or destroyed and reclaim your valuable storage space.

At Benson Records, we Store, Scan, Protect, Shred and Destruct.

Secure On-Site Service
To assist you and your office staff in completing a file purge, we can provide container drop-offs and rolling carts to help make the process easy, streamlined and efficient.

The Process
You collect and sort through your documents. Then, place the documents that you want purged into the collection containers for our later pickup.

Mobile Shredding
Some businesses prefer or require on-site confidential destruction of sensitive files and documents - documents never to leave your sight (or site!) without being completely destroyed. At Benson, we will even shred at your location. It's entirely up to you!

Drop-off
Benson also allows you to drop off your documents at our location. This is great for small businesses, the self-employed and Omaha (or surrounding) residents who may wish to shred their personal data and private information. Types of documents may include the following:

- Old Bank Records and Statements
- Pay Stubs
- Invoices
- Utility Bills
- Any other personal and private information

Drop-off Cost

- We charge $30 for up to 200 lbs. of shredding.
- Additional volume is $0.13 (thirteen cents) per lb.
- We also offer discounts for high volumes.

Document Storage

- Record Storage
- Active File Mgmt
- File Indexing
- Vital Records
- Web Access
- Pickup and Delivery
- Storage Cartons
- Inventory Mgmt

Scanning & Imaging

- Document Scanning
- Online Image Hosting

Shredding & Destruction

- Mobile – Onsite
- Plant Based
- Purges
- Scheduled Services
- Collection Container
- Media Destruction
- Drop-off Shred
- Hard Drive Shredding
- Pay per Shred

Secure, Reliable and Customer-focused.

Data Protection

- Tape Rotation
- Case Rotation
- Vital Records
- Film Sound Archives
- Firelock Vault
- Media Security
- PCI Validation

Vital Assets Storage

- Vital Records
- Video/Audio Archives
- Microfilm
- X-ray's
- Vault Specs
- Inventory Control

Purges

- Scheduled Service
- Collection Container
- Media Destruction
- Hard Drive Shredding
- Drop-off Shred

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