The Institute of Certified Records Managers (ICRM) is an international certifying organization of and for professional records and information managers. The ICRM was incorporated in 1975 to meet the requirement to have a standard by which persons involved in records and information management could be measured, accredited and recognized according to criteria of experience and capability established by their peers.

The primary objective of the ICRM is to develop and administer the program for professional certification of records managers, including certification examinations and a certification maintenance program. The ICRM serves as the official certifying body for ARMA International. Certified Records Managers (CRMs) are professional records and information managers experienced in records systems, and related disciplines such as archiving, computerization, micrographics, and optical disk technology. CRMs receive the CRM designation by meeting both educational and work experience certification requirements established by the ICRM and by passing the required examinations.

The many benefits of becoming a CRM include:

- The CRM designation shows you have achieved excellence in the field.
- Certification builds your self-esteem and confidence.
- Certification improves your career opportunities and advancement.
- Certification prepares you for and leads you to greater on-the-job responsibilities.
- Certification provides you with greater earnings potential.

The rewards of being a CRM are great but how do you get there?

The best way to discover if you have what it takes to be a CRM is to join our panel discussion of individuals at different stages of the CRM lifecycle.

Linda Maczko CRM, a recent CRM designate, will explain what the CRM entails, her reasons for becoming a CRM and the application procedure. Carol Lilly, a CRM candidate in process, will describe how she is currently organizing her approach to studying and taking the exams. Shelli Ellison CRM, an experienced CRM, will describe what having the CRM designation has meant to her career in records management. Bruce White CRM, current Treasurer for the ICRM, will provide information and written material to the attendees.

Don’t miss our final chapter meeting of the fiscal year. All San Diego ARMA members will receive an official San Diego ARMA Chapter Pin and join in the celebration of our Chapter exceeding the 100 member mark for the first time.

**Off the Record**

**Volume 43, Issue 6**

**July 14, 2006**

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**ARMA San Diego Chapter**

PO Box 500015
San Diego, CA 92150

**On-line RSVP:** http://www.sandiegoarma.org/arma_registration.htm

**Meeting:** Wednesday, June 14, 2006, 11:30 to 2:00
**Location:** Marriott Courtyard - Kearny Mesa
**Reservations - Contact Linda Maczko @ (858) 534-3995**
<p>Membership Corner</p>

By Linda Maczko

Welcome From the Membership Corner

Our membership continues to grow! 109 and counting!!!

Welcome to our new members for this newsletter.

Remember if you have any questions regarding your membership that you can contact either Tracee Hughs: thughs@rdblaw.com or myself: lmackzo@ucsd.edu. If you find any problems with your profile, please send an email to: member@arma.org.

Education

Elements that Define a Records Management Program

By Susan Roberts

1. Determining what records should be created in each business process and what information needs to be included in the records.
2. Deciding in what form and structure records should be created and captured and the technologies to be used.
3. Determining what metadata should be created with the record and through records processes and how that metadata will be persistently linked and managed.
4. Determining requirements for retrieving, using, and transmitting records between business processes and other users and how long they need to be kept to satisfy those requirements.
5. Deciding how to organize records so as to support requirements for use.
6. Assessing the risks that would be entailed by failure to have authoritative records of activity.
7. Preserving records and making them accessible over time in order to meet business requirements and community expectations.
8. Complying with legal and regulatory requirements, applicable standards, and organizational policy.
9. Ensuring that records are maintained in a safe and secure environment.
10. Ensuring that records are retained only for as long as needed or required.
11. Identifying and evaluating opportunities for improving the effectiveness, efficiency, or quality of its processes, decisions, and actions that could result from better records creation or management.
Records Management Mistakes to Avoid

Getting records management right is difficult. Sidestep these Top 10 mistakes to look good as you roll out your RM program.

In the post-Enron/Andersen/Sarbanes-Oxley environment, managers who are responsible for information management and records handling must continue to improve their capabilities to proactively administer and control vital corporate records. Companies operating under increased regulatory scrutiny are identifying the need to implement or improve records management strategies along with supporting records management (RM) systems to serve functional areas producing and managing company records.

Comprehensive, viable records management has taken on increased importance around the world. Companies and government agencies recognize that a well-constructed RM system provides many benefits, including:

- Enabling user to monitor, track, retrieve, maintain, retain and dispose of records according to retention schedules, rules, and trigger events
- Streamlining and standardizing records management across company departments and locations
- The primary means for maintaining retention schedules, records class codes and retention rules
- Automating and simplifying routine tasks
- Reducing the cost of operations by streamlining rapid records retrieval—whereby information can be produced quickly and on demand when required, reducing labor and administrative costs
- Protecting against potential litigation in that contents that should be discarded will be—and according to consistently applied standards and regulations

In developing and implementing RM systems for many companies over the past several years, our first step is to assess the company’s current situation and needs. It is very common for us to see incorrect assumptions or inadequate planning and implementation due to several initial misconceptions. In some situations, these mistakes have precluded companies from accomplishing their records management goals. We have encountered companies that found that systems they had implemented could not be maintained into the future. In other situations, new systems created havoc due to their design or manner in which implementation was attempted.

In this article, we will examine ten of the most common errors we have seen as companies attempt to design and implement RM systems. In addition, we will provide suggestions for preventing and/or correcting these errors.

**Mistake #1**

**Trying to implement portions of an RM solution . . . Before crafting a well-defined program.**

Managers often attempt to implement particular aspects of records management without a well-defined program and then find that they have to regroup and revise some of the work they thought they had accomplished.

For example, a user might begin to scan and code documents, and then discover that they employed is inappropriate for the overall program. Or, users may find that many of the documents they coded and cataloged are not records that should be retained.

**Suggestion:** Rollout the program only after the total design and parameters of the program have been defined, established, and tested.

**Mistake #2**

**Focusing on a single business driver ... instead of an overall solution.**

Managers often attempt to implement particular aspects of records management without a well-defined program and then find that they have to regroup and revise some of the work they thought they had accomplished.

For example, an organization or department might focus on compliance and attempt to base its global program on this issue. It may discover later that there are a variety of other issues—legal, technological, financial, personnel, etc.—that could complicate or even simplify that issue when taken together, yet were ignored in the initial design.

**Suggestion:** Build a solid business case for a records management program. During the design process, research, assess, and account for all important business drivers and benefits. This helps not only in your program design, but often helps obtain solid support from management.

**Mistake #3**

**Believing that an off-the-shelf package, alone, can be a universal RM solution that meets all needs.**

Although we might like to hope that purchasing off-the-shelf software and simply installing it is the answer, the software is only the tool—it’s the processes, definitions, and implementation that drive the system. Just as important, even the best software is often not the best solution. A successful records management program hinges on factors such as:

- A comprehensive needs assessment
- Defining records, procedures, and functions
- Expert project planning
- Experienced software/hardware evaluation and customization
- Effective training
- Technical & team support

**Suggestion:** Create an action plan and desired-features checklist and then compare it to the features and advantages the

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**ARMA Information**

- Compliance/Risk Management
- Electronic Records
- Legal/Regulatory Issues
- Privacy
- Records/Info Management Standards/Best Practices

New Online Courses: Issues and Approaches in Archiving Electronic Records. ARMA’s new online course will introduce you to the unique issues inherent to archiving electronic records. Learn about the strengths and weaknesses of various approaches to electronic records archiving, as well as recommendations for electronic archival processes and systems. Now available in the ARMA Learning Center.

**Useful Links**

**ARMA International Links**

**What is RIM?**

**ARMA Membership**

**ARMA Directories**

**ARMA Chapters and Regions**

**ARMA International Press Room**

**Educational Foundation**

**Calendar of Upcoming Events**

**FREE TRAINING CLASSES!!**

Centers for Education and Technology (CET), a part of the San Diego Community College District, is offering free training classes in a wide range of topics. Their Business Information Technology courses include offerings in HTML, XML, Java programming, JavaScript, UNIX, Cisco, Oracle, Linux, Visio, A+ Training, TO/PIC, MS Office and many others. These courses are offered at several campuses throughout the city.

Please take a look at their web site, [http://www.sandiegocet.net/index.php](http://www.sandiegocet.net/index.php), for class and registration information.

Check out vital information you might have missed!

**http://www.arma.org/learning/seminar_archive.cfm**

This is a link to ARMA Audio and Web Seminars that you might have missed.

Off the Record

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Mistake #4
Not understanding or distinguishing the differences between document management and records management.

Some organizations err in considering documents and records to be synonymous. They are not, and doing so can create problems.

Suggestion: "Records" are not just any document that an organization produces. From ISO 15489-1, a record is "information created, received, and maintained as evidence and information by an organization or person in pursuance of legal obligations or in the transaction of business." Whereas document management may involve the creation, editing, saving, reviewing, copying, deleting, and tracking of documents; records management must ensure record authenticity, reliability, integrity, and usability. Records cannot be altered and their availability, retention, and deletion must be carefully tracked and controlled.

Not only can organizations cause serious problems if they inappropriately delete or alter records, they need to be diligent regarding which records they retain and how long they retain them. At one extreme, doing nothing and hoping that the problem goes away is as risky as the other extreme, archiving everything.

Mistake #5
Attempting to implement and deploy a total RM program all at once ... as opposed to a phased in approach, often by department.

Attempting to deploy a records management program across all departments or locations can be very difficult and fraught with problems. Most organizations find that they gain additional experience and knowledge as they fine-tune their program during implementation. Attempting to implement all aspects at once precludes the sharing of these insights across the program.

Two important aspects that contribute to the success of an RM program are testing or piloting the project, and staff training. It is often difficult and unwieldy to train and pilot a program across several departments—each department's needs, learning style, and personnel will differ. Plus, lessons learned in deployment in one department often pay dividends later.
Records Management Mistakes to Avoid

(Continued from page 4)

during deployment in other departments.

So, does a phased-in approach leave you at any greater exposure to legal risk? Companies and organizations are much better off with a phased approach. Before phasing in the program, most likely there was not a good system or any system in place at all. What is accomplished in any one of the phases is usually a vast improvement over no-system or a bad system. And attempting to go all out as opposed to phasing-in could doom the entire project to failure, which is what we see many companies do when a total program deployment is attempted.

**Suggestion:** In the planning stages, create a well-designed pilot to be followed by a well-constructed deployment schedule by department or work area. In addition, consider phasing in the implementation by records type, media, or by task.

**Suggestion** on what to look for when you choose to outsource the design and implementation.

• Look for a company and consultants that have designed and implemented very successful records management programs for organizations like yours.

• Ensure that you and the consultants agree on the rationale for and how to justify an RM program.

• Be certain that the consultants know and understand the relevant issues—technical, business, policy, system, software, and hardware—the ensures success.

• Be certain that you and the outside company thoroughly understand the underlying business drivers that necessitate an RM program and how they should be successfully integrated.

• Analyze how outside consultants' expertise can help save time, expense and worry. The results can be RM solutions that are consistent with and comply with best practices, regulations, and standards for physical and electronic records.

• Work with the consultants on implementing and deploying the RM program in phases for maximum success.

• Look to the consultants' experience and expertise to develop and implement the procedures needed for an effective RM program.

• Inquire about the consultant's familiarity and experience with the major RM software products on the market.

• Look to the consultants to establish the communications path necessary for an RM program to succeed—within and between managers—department and facilities.

**Mistake #6**

Failing to plan for the full lifecycle of the system as well as the records.

Considering only the initial design and deployment; and thereby focusing only on the rollout; can create very costly problems in subsequent phases of the system's lifecycle. For example, failure to address all lifecycle stages may result in upgrades being difficult or even impossible. Migration paths may be severely limited or non-existent. Neglecting to perform periodic, regular reviews of the RM system can adversely affect the system's operation and compliance.

**Suggestion:** Plan ahead. Identify the system's lifecycle elements and timeframes as well as the lifecycles of the software and records. Build the necessary factors into the system's design that will maximize usability and manage costs throughout the system's expected life. Plan and execute periodic reviews of the procedures, technological and compliance issues, and policy and effect changes as necessary.

**Mistake #7**

Waiting for legal action against your company before considering, justifying or implementing an effective records management program.

Designing, creating, and implementing an RM program can't happen overnight. Companies now recognize that they must be proactive, not just to comply with legal requirements, but to be responsive and responsible to their shareholders, customers, and staff. In addition, a proactive program helps to increase efficiency and productivity, affecting financial as well as legal issues.

**Suggestion:** Ensure that your organization is either constructing or implementing an effective records management program today. If significant RM experience and expertise are not resident or available in-house, consider seeking a company that has knowledgeable staff experts to assess your needs, examine your current situation, and recommend ways to plan or strengthen your program.

**Mistake #8**

Failing to plan for adequate initial and long-term support for the RM program and technology.

Effective (and compliant) records management requires regular attention. Initially, RM managers, staff, and users should receive focused training. But records management is an on-going process—it requires monitoring, updating, re-evaluation, and planning over the long term as needs change; compliance and legal issues evolve; and as software, hardware, records storage, media, and other technologies advance. Continual support is critically necessary for records management to work effectively and efficiently.

**Suggestion:** Plan and provide for effective training and staffing dedicated to the process. As an example, one of our clients with over 1,000 users employs two dedicated FTE in-house personnel to manage and support its program in conjunc-
IT has proven its strategic value as a conduit for attaining business objectives and sustaining growth. Has IT also unwittingly assumed the risk associated with enterprise information?

The sheer volume of electronic records makes them high risk, and the probability of consequences is high. Well-researched companies have been scanned by errant e-mails or forgeries like clean ups. The resulting reputational damage, and its negative effect on stock value, risks shareholders, the boardroom, and has repercussions throughout the C suite.

Electronic records pose an enterprise risk that is pervasive, affecting operations in every line of business. Possible exposures include legal discovery, regulatory inspections, industry investigations, and privacy rule violations. In each instance, proof of built or innocence resides in records made and maintained using information technology.

CIOs, as the guardians of corporate data processes, find themselves adding records management to their list of expanding responsibilities. According to survey commissioned by ARMA International and conducted by Forrester Consulting, CIOs and IT organizations are routinely tapped to provide solutions to compliance, legal, and regulatory challenges involving electronic records. Although responsibility for implementing records control is usually delegated many levels below the CIO, its oversight and effectiveness are not. Here, then, are 10 things CIOs should know about managing electronic records.

1. Managing e-records is about control, not access. Basic control elements are the ability to identify a record, attach a retention rule, keep the record unalterable for as long as required, enforce the retention rule through reliable destruction, and, alternatively, suspend destruction if investigation or litigation is pending or imminent. Retracting control to systems designed for information access is difficult and imposing requirements on users is not popular.

2. Policy infrastructure is key. Managing e-records requires corporate policies, consistent retention rules, defined procedures, employee training, and audit capability. This programmatic approach to keeping and eliminating records in the ordinary course of business assures that records needed as evidence are preserved. It also demonstrates an expectation of consistency, responsibility and accountability that has a better chance of standing up to outside challenges.

3. Clout is important for practical and political reasons. Effective records management requires a mandate from the highest levels. Thanks to Sarbanes-Oxley executives are not personally accountable for governance lapses, facing jail, sanctions and out-of-pocket settlement payments so obtaining buy-in is not difficult. Beyond this, most companies put three levels of structure in place:
   - an oversight committee of legal, compliance, and corporate management executives who sign off on all policies and rules.
   - A records council - consisting of IT, legal, compliance, finance, records management, and human resources—that develops the policy infrastructure, obtains oversight committee approval and recommends changes over time.
   - A liaison group of process and system owners responsible for day-to-day activities regarding electronic records.

4. Investing in technology without thinking through the details is a waste. Technology tools for records don't come with pre-written policies or rules. In order to work at all, solutions must be fine-tuned to the company's internal nuances, for example, which rendition—PDF, Word file, scanned image—is the record? Are all drafts also records or only the final, approved version?

The Rules of the Game

Unlike corporate knowledge or business intelligence, electronic records are evidence. They accrue to business processes, show what transpired during transactions, confirm rights and obligations, and provide motive for corporate action.

Legal adversaries, regulatory inspectors, and industry investigators can and do use your records to build their case. Some basic facts:

- If you have the requested information, you must produce it, even if you could have or should have destroyed it. This implies knowing what to keep for how long based on industry-specific regulations, federal, state, and local laws, compliance requirements, and operational needs.
- Those examining your records must be satisfied that information practices are consistent and take place in the due course of business. Companies must show proof that there is a program in place governing information handling from creation to disposition, and that all employees follow the program.
- To use your own records in defense, you must be able to show that systems responsible for creating, managing and storing them work reliably, produce accurate, authentic records and prevent intentional or inadvertent alteration.
- You can’t destroy information that will be needed if a lawsuit or investigation is pending or imminent. There must be ways to suspend ordinary destruction and make sure that needed information is not accidentally erased or overwritten.
- Protecting information from outside eyes by claiming attorney-client privilege must be corroborated by processes that don’t allow prying eyes to circulate outside the company.

Mistake #9

Assuming that a single step or tactic can drive the strategic direction for creating an effective RM program.

A single step—such as buying software or hiring a records manager or handing over responsibility to QC or IT departments—cannot ensure success. Effective records management programs are not created piecemeal. For example, a company may discover downstream that the RM software they purchased doesn’t integrate with their EDM.

Suggestion: Take a top-down approach to records management. Develop strategies, policies, and requirements first, then develop the program.

Mark Barsoum (mBarsoum@nuconsoft.com) serves as a director of Rusco, Inc. He has experience since 1983 in the design, development, and deployment of R&D, manufacturing, and records management systems within pharmaceutical and other industries. In addition, he has designed and managed the successful validation and deployment of several integrated cross-functional systems for companies such as Centocor, McKinnon Consumer and Specialty Pharmaceuticals, Rohm and Haas, DuPont Pharmaceuticals, and AstoZeneca.

This article appeared in AIIM E-DOC Magazine, May-June 2006. Volume 20, Issue 3, page 30. For more records management information go to: www.edocmagazine.com/imposter for a list of articles related to records management that have appeared in the pages of AIIM E-DOC Magazine.
Job No. 1 for the U.S.: Build a Tech Workforce

Today—to find the tech talent they need.

That may sound like posturing in order to create a more abundant—and cheap—labor supply for their companies, but they cite plenty of evidence to back up their concerns. Chambers, who wants to see American kids in kindergarten through third grade get a better grounding in math and science, notes that by the time they reach their teens they consistently score near the bottom in those subjects in tests among the industrialized countries. For example, in the most recent OECD test of math an science skills of 15-year-olds, the United States ranked 28th and 22nd, respectively, out of 40 countries. In problem-solving skills, American students ranked 29th. Finland, Hong Kong, South Korea, and Japan were among the leaders in all three categories.

If we don’t fix the primary education system in this country—reward the best teachers with higher pay, improve school infrastructure and teaching methods—“we’ll leave behind 40% to 50% of our children,” Chambers maintains. Noonan, the ISS chief, is ready to go radical: Privatize the entire U.S. education system to make teachers and administrators more competitive and accountable.

Meantime, developing countries are priming their tech workforces. Noonan says he recently spoke to a audience of 700 info-Alliance security doctoral and master’s degree candidates at Beijing University. By comparison, he says, the entire United States has only about 250 such candidates. “When you’re putting that kind of horsepower against problems, stuff will happen,” says Noonan, who notes that China has more English speakers than the United States.

Kennelly, the Riverbed CEO, notes that technical innovation drives productivity gains, which in any country is the source of wealth creation. Therefore, if U.S. companies don’t have ready access to that ingenuity, the domestic economy will stagnate. Another key source of wealth, population growth, is near stagnant in the industrialized world, so Kennelly rails against policies that keep bright foreign managers, inventors, engineers, programmers, and other professionals from emigrating to and working in the United States. “Countries losing their people to other countries should be complaining,” he says, “not the other way around.”

Silver Peak’s Tinsley sees a deeper cultural weakness: From the baby boomers to the current generation, technical education has been viewed as less and less important. Many a reader will argue that fewer American students are gravitating to the hard sciences because they see U.S. companies exporting those related jobs. But with U.S. tech employment and salaries at all-time highs, it’s clear that’s not a zero-sum game.

What’s your take? Should we be worrying more about $70-a-barrel oil, our under funded Social Security system, our mounting national debt, or some other pressing economic challenge than about giving these fat cat CEOs their pick of a plentiful labor supplier? Or is this only in for bigger trouble if we don’t pay more attention to the tech workforce of the future? Drop me a note at the address below.

This article appeared in Information Week, Issue 1,088, May 8, 2006, page 68 and was written by Rob Preston, VP/Editor in Chief. He can be reached at rpreston@zorp.com.

What CIOs Should Know About Records

IT has proven its strategic value as a conduit for attaining business objectives and sustaining growth. Has IT also unwittingly assumed the risk associated with enterprise information?

The sheer chaos of electronic records makes them high risk, and the probability of consequences is high. Well-respected companies have been scanned and their industry executives have been found in the C suite. The resulting reputational damage, and its negative effect on stock value, risks to shareholders, rocks the boardroom, and has repercussions throughout the C suite.

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CIOs, as the guardians of corporate data processes, find themselves adding records management to their list of expanding responsibilities. According to survey commissioned by ARMA International and conducted by Forrester Consulting, CIOs and IT organizations are routinely tapped to provide solutions to compliance, legal, and regulatory challenges involving electronic records. Although responsibility for implementing records control is usually delegated many levels below the CIO, its oversight and effectiveness are not. Here, then, are 10 things CIOs should know about managing electronic records.

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2. Policy infrastructure is key. Managing e-records requires corporate policies, consistent retention rules, defined procedures, employee training, and audit capability. This programmatic approach to keeping and eliminating records in the ordinary course of business assures that records needed as evidence are preserved. It also demonstrates an expectation of consistency, responsibility and accountability that has a better chance of standing up to outside challenges.

3. Cost is important for practical and political reasons. Effective records management requires a mandate from the highest levels. Thanks to Sarbanes-Oxley executives are not personally accountable for government lapses, facing jail, sanctions and out-of-pocket settlement payments, so obtaining buy-in is not difficult. Beyond this, most companies put three levels of structure in place:

• an oversight committee of legal, compliance, tax, and corporate management executives who sign off on all policies and rules.
• A records council—consisting of IT, legal, compliance, finance, records management, and human re-
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What CFOs Should Know About Records

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(Continued from page...

document? The answers require input from process owners and users, not IT.

5. Content determines value, not the transport mechanism. E-mail is one aspect of overall records management, not a separate issue. Generally, the value of messages and attachments depends on their content, and content determines what retention rules apply. Rules based on controlling e-mail storage volume—for example, retaining all messages for 80 days—are problematic because they assume all e-mail is created equal, which it isn’t. Products that don’t differentiate e-mail by content work well if all messages fit one content category such as customer correspondence in financial services businesses, but such products are not effective in cases where e-mails vary greatly in content and in record value.

6. Records management needs influence ILM decisions. ILM matches storage media with information activity level, age, volume, or other criteria so that older, less active data is stored in cheaper ways. RM’s emphasis is on enforcing information management policy, regardless of how the records are stored. The need to preserve certain records long term for retention or legal purposes will factor into storage selection, upgrade and migration decisions.

7. Distinguishing between e-records archives and backups is smart strategy. An archive is a repository that provides secure retention of e-records for compliance and operational purposes. Many companies don’t have electronic archives, so attorneys and others to go backup tapes as rich sources of discoverable information. Service costs average about $250 per backup tape to find, read and process material relevant to discovery requests, and it’s common to find thousands of tapes in companies where not retention rules have been implemented or followed. Pending changes to the Federal Rules of Civil Procedure could limit legal discovery to records kept in archives. If the FRCP changes take effect, adversaries that want backups would have to demonstrate why and share costs associated with producing them.

8. Risk mitigation costs money. The biggest investment is time required to develop or revise policy infrastructure. Consulting rates vary from $100 to more than $300 per hour depending on the expertise desired. Hiring in-house records manager may be more cost effective. Other out-of-pocket costs involve technology purchase, integration and implementation. Records management software costs about $250 to $800 per seat, and $25,000 and up per server. E-mail management solutions are $60,000 and up per server and up. Most enterprise content management products have acquired records management capabilities. The offset is cost avoidance. A DuPont study over five years found that half of all materials reviewed for discovery were past retention and could have been safely destroyed under a records program. But because they weren’t, and were discoverable, the company spent $11 million more than necessary responding to discovery requests.

9. Global firms control records policy centrally but implement locally. Best practices are to set corporate policy, provide templates and establish adequacy standards for retention rules, procedures and training. Individual locations formulate their own ways to implement and comply with corporate policy. The result is consistency of approach but ample customization to accommodate local requirements.

10. Build records control into process and system design. Manual intervention does not work. Users will spend 15 seconds or less puzzling through manual classification hierarchies for e-records and will blithely choose deficiencies where possible. It’s better to rely on records control methods that use meta data, auto-classification techniques or structured workflows in cases where records can be pre-defined.

Without question, information management is a high stakes game. The paper trail is not digital, and its first stop is the CIO’s office. Managing e-records risk pro-actively makes sense for business entities and the CIO’s who routinely lead people, processes and technology in strategic enterprise efforts.

Julie Gable is Principal of Gable Consulting and Associate Executive Editor of the Information Management Journal, a publication of ARMA International (www.arma.org). Reach her at juliegable@verizon.net.

2005-2006 Meeting Programs

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June 2006

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What CIOs Should Know About Records

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5. Content determines value, not the transport mechanism. E-mail is one aspect of overall records management, not a separate issue. Generally, the value of messages and attachments depends on their content, and content determines whether retention rules apply. Rules based on controlling e-mail storage volume—for example, retaining all messages for 60 days—are problematic because they assume all e-mail is created equal, which it isn't. Products that don't differentiate e-mail by content work well if all messages fit one content category such as customer correspondence in financial services businesses, but such products are not effective in cases where e-mails vary greatly in content and in record value.

6. Records management needs influence ILM decisions. ILM matches storage media with information activity level, age, volume, or other criteria so that older, less active data is stored in cheaper ways. RM's emphasis is on enforcing information management policy, regardless of how the records are stored. The need to preserve certain records long term for retention or legal purposes will factor into storage selection, upgrade and migration decisions.

7. Distinguishing between e-records archives and backups is smart strategy. An archive is a repository that provides secure retention of e-records for compliance and operational purposes. Many companies don't have electronic archives, so attorneys and others go to backup tapes as sources of discoverable information. Service costs average about $250 per backup tape to find, read and process material relevant to discovery requests, and it's common to find thousands of tapes in companies where not retention rules have been implemented or followed. Pending changes to the Federal Rules of Civil Procedure could limit legal discovery to records kept in archives. If the FRCP changes take effect, adversaries that want backups would have to demonstrate why and share costs associated with producing them.

8. Risk mitigation costs money. The biggest investment is time required to develop or revise policy infrastructure. Consulting rates vary from $100 to more than $300 per hour depending on the expertise desired. Hiring an in-house records manager may be more cost effective. Other out-of-pocket costs involve technology purchase, integration and implementation. Records management software costs about $250 to $800 per seat, and $25,000 and up per server. E-mail-management solutions are $600 to $900 per server. Most enterprise content management products have acquired records management capabilities. The offset is cost avoidance. A DuPont study over five years found that half of all materials reviewed for discovery were past retention and could have been safely destroyed under a records program. But because they weren't, and were discoverable, the company spent $11 million more than necessary responding to discovery requests.

9. Global firms control records centrally but implement locally. Best practices are to set corporate policy, provide templates and establish adequacy standards for retention rules, procedures and training. Individual locations formulate their own ways to implement and comply with corporate policy. The result is consistency of approach but ample customization to accommodate local requirements.

10. Build records control into process and system design. Manual intervention does not work. Users will spend 15 seconds or less puzzling through manual classification hierarchies for e-records and will blithely choose defaults where possible. It's better to rely on records control methods that use metadata, auto-classification techniques or structured workflows in cases where records can be pre-defined.

Without question, information management is a high stakes game. The paper trail is not digital, and its first stop is the CIO's office. Managing e-records risk pro-actively makes sense for business entities and the CIO's who routinely lead people, processes and technology in strategic enterprise efforts.

Julie Gable is Principal of Gable Consulting and Associate Executive Editor of the Information Management Journal, a publication of ARMA International (www arma.org). Reach her at julie-gable@arma.org.
What CIOs Should Know About Records

IT has proven its strategic value as a conduit for attaining business objectives and sustaining growth. Has IT also unwittingly assumed the risk associated with enterprise information?

The era of disjointed, inarticulate electronic records makes them high risk, and the probability of consequences is high. Well-respected companies have been scanned for their assets by widely publicized data theft and lost the trust of shareholders, customers, and employees.

In the case of corporate knowledge or business intelligence, electronic records are evidence. They accrue to business processes, show what transpired during transactions, confirm rights and obligations, and provide means to prove contractual compliance. Legal adversaries, regulatory inspectors, and industry investigators can and do use your records to build their cases. Some basic facts:

- Electronic records pose an enterprise risk that is pervasive.
- Investing in technology without thinking through the details is a waste. Technology tools for records don’t exist. Some basic facts:

1. Managing e-records is about control, not access. Basic value, risk sharing, and accountability are identity to identify an e-record, attach a retention rule, keep the record unalterable for as long as required, enforce the retention rule through reliable destruction, and, alternatively, suspend destruction if investigation or litigation is pending or imminent. Retrofitting control to systems designed for information access is difficult and imposing requirements on users is not popular.

2. Policy infrastructure is key. Managing e-records requires corporate policies, consistent retention rules, defined procedures, employee training, and audit capability. This programmatic approach to keeping and eliminating records in the ordinary course of business assures that records needed as evidence are preserved. It also demonstrates an expectation of consistency, responsibility and accountability that has a better chance of standing up to outside challenges.

3. CIOs have been found lacking in their knowledge of records management law, and their actions have required them to be held personally accountable for governance lapses, failing jail, sanctions and out-of-pocket settlement payments, so obtaining buy-in is not difficult. Beyond this, most companies put three levels of structure in place:

   - an oversight committee of legal, compliance, tax, and corporate management executives who sign off on all policies and rules.
   - A records council—consisting of IT, legal, compliance, finance, records management, and human resources—that develops the policy infrastructure, obtains oversight committee approval and recommends changes over time.
   - A liaison group of process and system owners responsible for day-to-day activities regarding electronic records.

4. Investing in technology without thinking through the details is a waste. Technology tools for records don’t exist. Some basic facts:

- If we don’t fix the primary education system in this country—reward the best teachers with higher pay, improve school infrastructure and teaching methods—’we’ll leave behind 40% to 50% of our children,” Chambers maintains. Noonan, the ISS chief, is ready to go radical: Privatize the entire U.S. education system to make teachers and administrators more competitive and accountable.

- Silver Peak’s Tinsley sees a deeper cultural weakness: From the baby boomers to the current generation, technical education has been viewed as less and less important. Many a reader will argue that fewer American students are gravitating to the hard sciences because they see U.S. companies exporting those related jobs. But with U.S. tech employment and salaries at all-time highs, it’s clear that this isn’t a zero-sum game.

- What’s your take? Should we be worrying more about $70-a-barrel oil, our under funded Social Security system, our mounting national debt, or some other pressing economic challenge than about giving these fat cat CEOs their pick of a plentiful labor market? Or is this worry in for bigger trouble if we don’t pay more attention to the tech workforce of the future? Drop me a note at the address below.

This article appeared in Information Week, Issue 1,088, May 8, 2006, page 68 and was written by Rob Preston, VP/Editor in Chief. He can be reached at rpreston@cm intimidating.com

The Rules of the Game

Unlike corporate knowledge or business intelligence, electronic records are evidence. They accrue to business processes, show what transpired during transactions, confirm rights and obligations, and provide means to prove contractual compliance. Legal adversaries, regulatory inspectors, and industry investigators can and do use your records to build their cases. Some basic facts:

- If you have the requested information, you must produce it, even if you could have or should have destroyed it. This implies knowing what to keep for how long based on industry-specific regulations, federal, state and local laws, compliance requirements, and operational needs.
- Those examining your records must be satisfied that information practices are consistent and take place in the due course of business. Companies must be able to prove that there is a program in place governing information handling from creation to disposition, and that all employees follow the plan.
- To use your own records in defense, you must be able to show that systems responsible for creating, managing and storing them work reliably, produce accurate, authentic records and prevent intentional or inadvertent alteration.
- You can’t destroy information that will be needed if a lawsuit or investigation is pending or imminent. There must be ways to suspend ordinary destruction and make sure that needed information is not accidentally erased or overwritten.
- Protecting information from outside eyes by claiming attorney-client privilege must be corroborated by processes that don’t allow proprietary information to circulate outside the company.

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Mistake #9
Attempting to use personnel who don’t have records management training or experience to lead the effort. Effectively managing and supporting an RM program requires wide-ranging knowledge, experience, aptitude, and understanding. All too often, organizations fail to place properly-qualified, trained, and experienced personnel into the role of records managers. Experienced records managers know the policy, legal, technology, and system issues. Without proper training and experience, the job is daunting and prone to problems.

Suggestion: Find and hire personnel who have the background and credentials in records management or, if promoting from within your organization, provide the necessary (and comprehensive) training. Using a team approach, be certain to include all relevant individuals—executives, legal staff, IT, warehousing, etc.—in the planning and implementation phases.

Mistake #10
Assuming that a single step or tactic can drive the strategic direction for creating an effective RM program. A single step—such as buying software or hiring a records manager or handing over responsibility to QC or IT departments—cannot ensure success. Effective records management programs are not created piecemeal. For example, a company may discover downstream that the RM software they purchased doesn’t integrate with their EDM.

Suggestion: Take a top-down approach to records management. Develop strategies, policies, and requirements first, then develop the program.

(Continued from page 5)

Mark Barsoum (mbarsoum@ruscoservices.com) serves as a director of Rusco, Inc. He has experience since 1983 in the design, development, and deployment of R&D, manufacturing, and records management systems within pharmaceutical and other industries. In addition, he has designed and managed the successful validation and deployment of several integrated cross-functional systems for companies such as Centocor, McNeil Consumer and Specialty Pharmaceuticals, Rohm and Haas, DuPont Pharmaceuticals, and AstraZeneca.

This article appeared in AIIM E-DOC Magazine, May-June 2006, Volume 20, Issue 3, page 30. For more records management information go to: www.edocmagazine.com/rmposter for a list of articles related to records management that have appeared in the pages of AIIM E_DOC Magazine.
Records Management Mistakes to Avoid

(Continued from page 4)

during deployment in other departments.

So, does a phased-in approach leave you at any greater exposure to legal risk? Companies and organizations are much better off with a phased in approach. Before phasing in the program, most likely there was not a good system or any system in place at all. What is accomplished in any one of the phases is usually a vast improvement over no-system or a bad sys-

tem. And attempting to go all out as opposed to phasing-in could doom the entire project to failure, which is what we see most times happening when a total program deployment is attempted.

Suggestion: In the planning stages, create a well-designed pilot to be followed by a well-constructed deployment schedule by department or work area. In addition, consider phasing in the implementation by records type, media or by task.

Mistake #6

Suggestions on what to look for should you choose to

Outsource the design and implementation.

Failing to plan for the full lifecycle of the system as well as the records.

Considering only the initial design and deployment; and thereby focusing only on the rollout; can create very costly problems in subsequent stages of the system's lifecycle. For example, failure to address all lifecycle stages may result in upgrades being diffi-
cult or even impossible. Migration paths may be severely limited or even non-existent. Neglecting to perform periodic, regular reviews of the RM system can adversely affect the system's op-
eration and compliance.

Suggestion: Plan ahead. Identify the system's lifecycle ele-
ments and timeframes as well as the lifecycles of the software and records. Build the necessary factors into the system's design that will maximize usefulness and minimize costs—throughout the system's expected life. Plan and execute periodic reviews of the procedures, technological and compliance issues, and poli-
cies and effect changes as necessary.

Mistake #7

Waiting for legal action against your company before considering, justifying or implementing an effective re-
cords management program.

Designing, creating, and implementing an RM program can't happen overnight. Companies now recognize that they must be proactive, not just to comply with legal requirements, but to be responsive and responsible to their shareholders and owners, customers, and staff. In addition, a proactive program helps to increase efficiency and productivity, affecting financial as well as legal issues.

Suggestion: Ensure that your organization is either construct-
ing or implementing an effective records management program today. If significant RM experience and expertise are not resident or available in-house, consider seeking a company that has knowledgeable staff experts to assess your needs, examine your current situation, and recommend ways to plan or strengthen your program.

Mistake #8

Failing to plan for adequate initial and long-term support for the RM program and technology.

Effective (and compliant) records management requires regular attention. Initially, RM managers, staff, and users should receive comprehensive training. But records management is an on-going process—it requires monitoring, updating, re-
evaluation, and planning over the long term as needs change; compliance and legal issues evolve; and as software, hard-
ware, records storage, media, and other technologies advance. Continual support is critically necessary for records manage-
ment to work effectively and efficiently.

Suggestion: Plan and provide for effective training and staffing dedicated to the process. As an example, one of our clients with over 1,000 users employs two dedicated FTE in-house personnel to manage and support its program in conjunc-
tion with our consultation on an as-needed or as-planned basis.

(Continued on page 6)
Mistake #4
Not understanding or distinguishing the differences between document management and records management.

Some organizations err in considering documents and records to be synonymous. They are not, and doing so can create problems.

Suggestion: "Records" are not just any document that an organization produces. From ISO 15489-1, a record is "information created, received, and maintained as evidence and information by an organization or person in pursuance of legal obligations or in the transaction of business." Whereas document management may involve the creation, editing, saving, reviewing, copying, deleting, and tracking of documents; records management must ensure record authenticity, reliability, integrity, and usability. Records cannot be altered and their availability, retention, and deletion must be carefully tracked and controlled.

Not only can organizations cause serious problems if they inappropriately delete or alter records, they need to be diligent regarding which records they retain and how long they retain them. At one extreme, doing nothing and hoping that the problem goes away can be as risky as the other extreme, archiving everything.

Mistake #5
Attempting to implement and deploy a total RM program all at once ... as opposed to a phased in approach, often by department.

Attempting to deploy a records management program across all departments or locations can be very difficult and fraught with problems. Most organizations find that they gain additional experience and knowledge as they fine-tune their program during implementation. Attempting to implement all aspects at once precludes the sharing of these insights across the program.

Two important aspects that contribute to the success of an RM program are testing or piloting the project, and staff training. It is often difficult and unwieldy to train and pilot a program across several departments—each department’s needs, learning style, and personnel will differ. Plus, lessons learned in deployment in one department often pay dividends later...
Records Management Mistakes to Avoid

Getting records management right is difficult. Sidestep these Top 10 mistakes to look good as you roll out your RM program.

1. Trying to implement portions of an RM solution . . . Before crafting a well-defined program.
   Suggestion: Rollout the program only after the total design and parameters of the program have been defined, established and tested.

2. Focusing on a single business driver ... instead of an overall solution.
   Suggestion: Build a solid business case for a records management program. During the design process, research, assess, and account for all important business drivers and benefits. This helps not only in your program design, but often helps obtain solid support from management.

3. Believing that an off-the-shelf package, alone, can be a universal RM solution that meets all needs.
   Suggestion: Create an action plan and desired-features checklist and then compare it to the features and advantages the
President's Message

The year is coming to a close. We've had an exciting year filled with informational meetings, a full-day seminar on Compliance and even an offsite June meeting. A new Board will be sworn in and we'll be off next September on a new journey through the maze of the records management world. It has been my pleasure to serve as your president, newsletter editor and webmaster this year and I hope that our programs have enlightened you, challenged you and provided you with opportunities to meet new colleagues, renew old friendships and learned new skills to become more proficient in your job.

As many of you know, I am leaving SDPC and moving to a new job with SDG&E. Because I will not know the time constraints of the new position, I am stepping down as the President, newsletter editor and webmaster for next year. I am planning to finish my term the following year if the job permits and the Board approves.

Welcome to our new members for this newsletter. As many of you know, I am leaving SDDPC and moving to a new job with SDG&E. Because I will not know the time constraints of the new position, I am stepping down as the President, newsletter editor and webmaster for next year. I am planning to finish my term the following year if the job permits and the Board approves.

Welcome to our new members for this newsletter.

Remember if you have any questions regarding your membership that you can contact either Tracee Hughs: thughs@mtlaw.com or myself: lmackoz@ucsd.edu. If you find any problems with your profile, please send an email to: member@arma.org.

Membership Corner

By Linda Maczko

Welcome to our new members for this newsletter.

Education

Elements that Define a Records Management Program

By Susan Roberts

1. Determining what records should be created in each business process and what information needs to be included in the records.
2. Deciding in what form and structure records should be created and captured and the technologies to be used.
3. Determining what metadata should be created with the record and through records processes and how that metadata will be persistently linked and managed.
4. Determining requirements for retrieving, using, and transmitting records between business processes and other users and how long they need to be kept to satisfy those requirements.
5. Deciding how to organize records so as to support requirements for use.
6. Assessing the risks that would be entailed by failure to have authoritative records of activity.
7. Identifying and evaluating opportunities for improving the effectiveness, efficiency, or quality of its processes, decisions, and actions that could result from better records creation or management.
The Institute of Certified Records Managers (ICRM) is an international certifying organization of and for professional records and information managers. The ICRM was incorporated in 1975 to meet the requirement to have a standard by which persons involved in records and information management could be measured, accredited and recognized according to criteria of experience and capability established by their peers. The primary objective of the ICRM is to develop and administer the program for professional certification of records managers, including certification examinations and a certification maintenance program. The ICRM serves as the official certifying body for ARMA International. Certified Records Managers (CRMs) are professional records and information managers experienced in records systems, and related disciplines such as archives, computerization, micrographics, and optical disk technology. CRMs receive the CRM designation by meeting both educational and work experience certification requirements established by the ICRM and by passing the required examinations.

The many benefits of becoming a CRM include:
- The CRM designation shows you have achieved excellence in the field.
- Certification builds your self-esteem and confidence.
- Certification improves your career opportunities and advancement.
- Certification prepares you for and leads you to greater on-the-job responsibilities.
- Certification provides you with greater earnings potential.

The rewards of being a CRM are great but how do you get there?

The best way to discover if you have what it takes to be a CRM is to join our panel discussion of individuals at different stages of the CRM lifecycle.

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