

"Today's organizations **cannot demonstrate compliance** without **consistent enterprise-wide recordkeeping.**"

What are your goals for today's session?

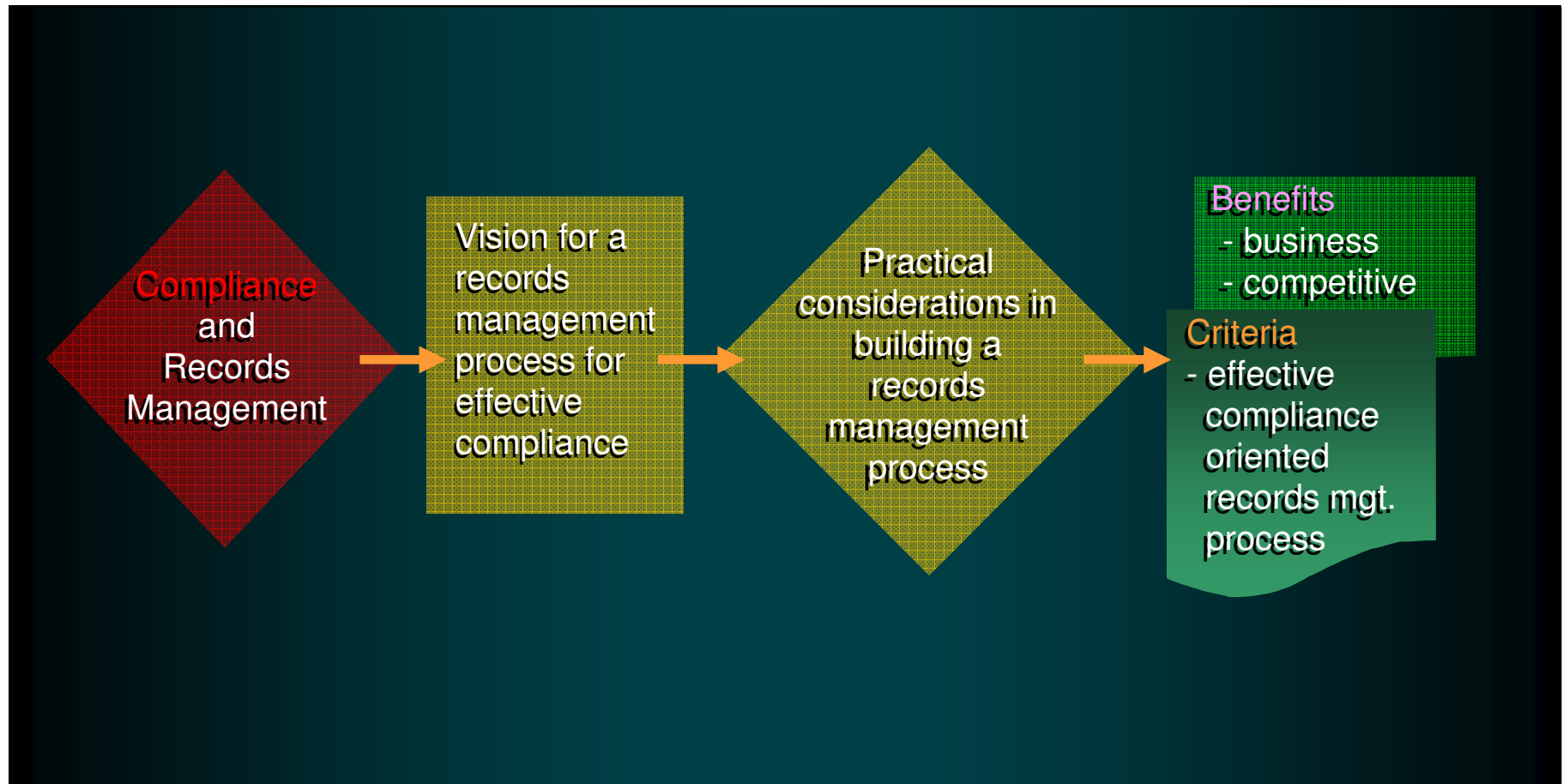
Connection  
between  
**compliance**  
and  
records  
management?

Evaluation of  
your records  
management  
process to a  
standardized  
framework?

Proven steps to  
overcome  
barriers in  
fixing your  
records  
management  
system?



## Focus Areas



# Focus area #1.



Compliance  
and  
Records  
Management

A mandate for access to contextual  
information

Consequences of failure

What's needed for compliance

Regulations share requirements

Complexity of enterprise-wide records  
management for compliance



# Why Records Management for Compliance?

## Consequence:

- Loss of exchange listing
- Multi million dollar files
- Imprisonment
- Restricted role

## Fines/Charges:

### **\$1.6B** Morgan Stanley

- Concealed knowledge of 1,423 backup tapes

### **\$604M** Morgan Stanley

- Delayed discovery of records (on tape).

### **\$29.3M** UBS

- [missing] evidence considered unfavorable

### **\$10M** Banc of America Securities -

- "repeatedly failed promptly to furnish"
  - records (compliance, stock-trading)
- Misinformation about records
- Incomplete, unreliable data.

### **\$2.75M** Philip Morris -

- didn't save electronic records [per policy]



# Compliance- separate regulations mandate the same fundamental requirements

## ***Accountability and Accuracy:***

- Timely Reporting
- Accurate and updated information
- Confidentiality protected
- Controlled access/authorized views
- Information secured and retained
- Attested proof of all of the above
  - *Strategy, Policies, Process, Tools*

<b>Report</b>	<b>Category</b>	<b>Agency</b>
Annual Report Unscheduled material events / corp changes	Financial Reports	Securities & exchange. Commission
LM-2 (Labor organization annual report?)	Office of Workers Compensation Programs, etc.	Dept of labor
NMSN (Nat'l Medical Support Notice),	Office of Evaluation and Inspections, etc.	Health and human services



# Contextual information is recorded across enterprise resources

*Enterprise Resource Planning*  
*Supply Chain Management*  
*Customer Relationship Management*

*Knowledge*

Security

Servers

Policies

*Information*

Profile

Connectivity

Rules

*Records*

Data Models

Clients

Access

*Content*

Structure

Storage

Users

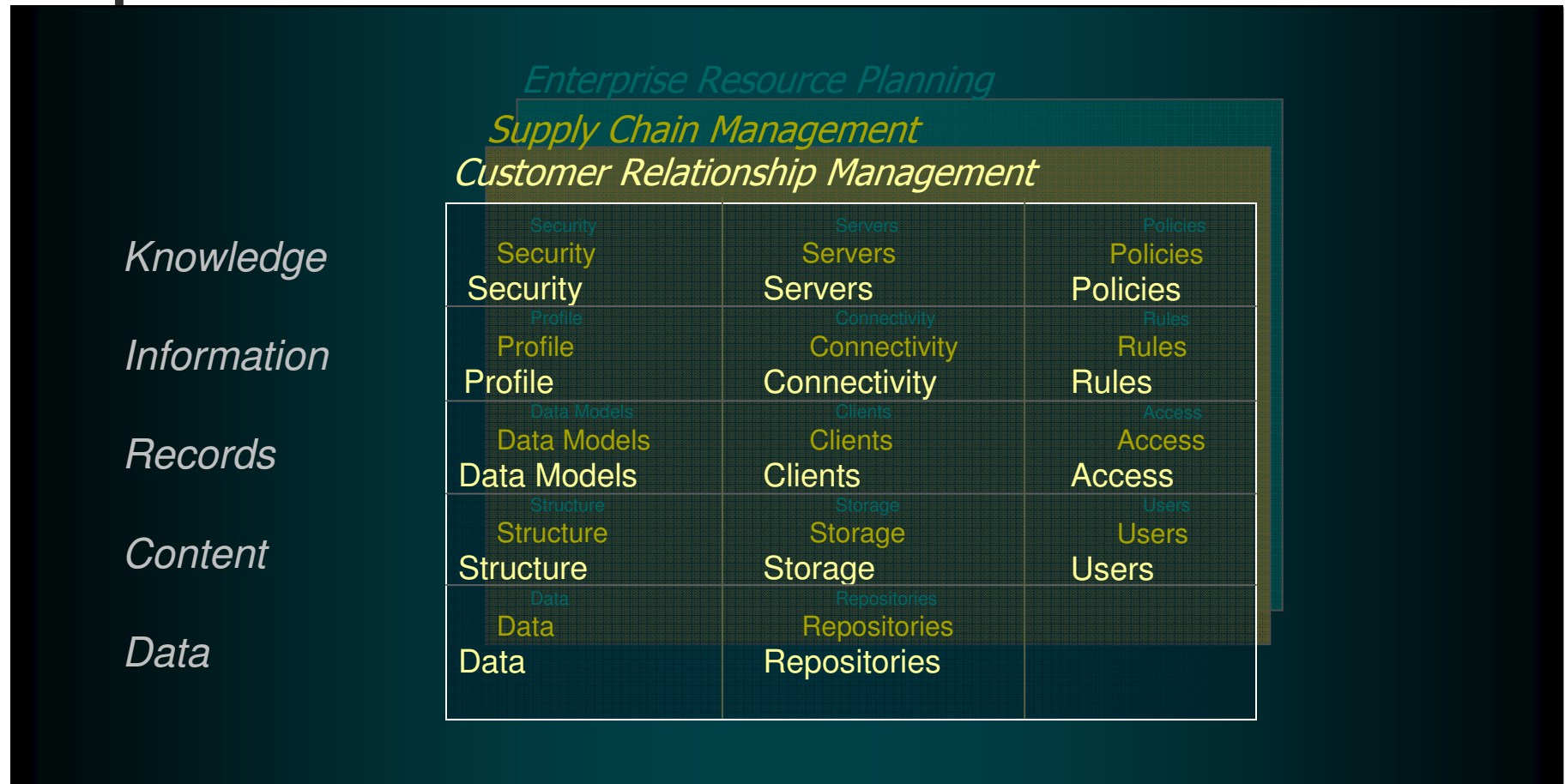
*Data*

Data

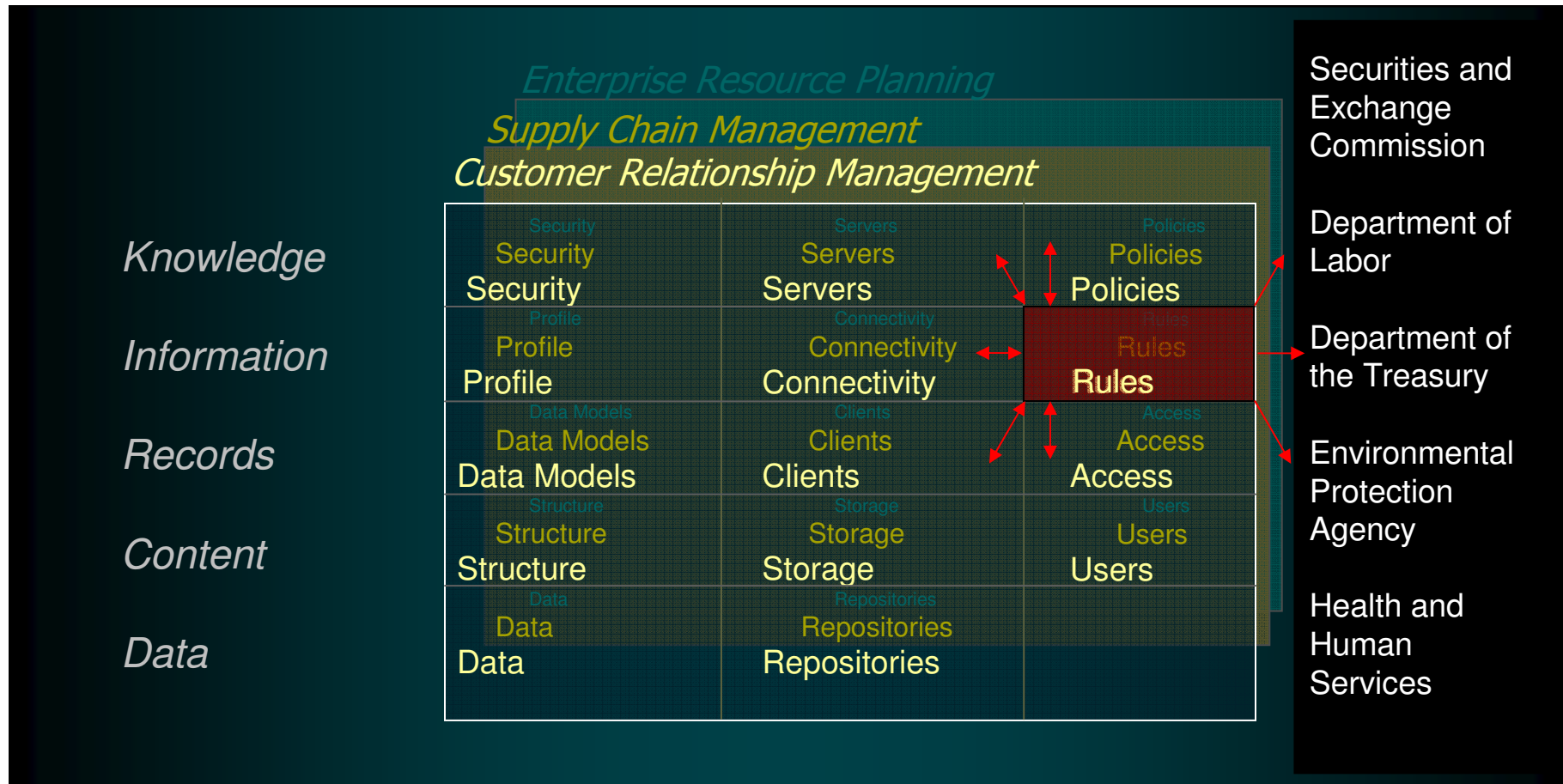
Repositories



# Information resides in silos and repositories



# For compliance, records must be extracted based on rules



# What records management process must demonstrate for compliance

## **Hierarchical storage, contextual, comprehensive, search**

Secure environment  
(apps, infrastructure, PCs, shared files)

Controlled, role-based access

Search/find relevant content

Reliable (accurate, fact-supported, documented)

## **Update, maintain, log**

Update records

Drive out errors in compliance processes

Reduce the number of key controls to compute results

## **Report, archive, dispose**

File reports in a timely manner

Archive required records

Dispose obsolete records from all instantiations  
(content mgt., shared files, PCs, records)



## Focus area #2.

Records management and compliance

Vision for a records management process for effective compliance

Integration framework for records management

What is a record?

What must a record deliver for compliance?

Envisioning an integration framework for records management and compliance



# Definition and components of a “Record”

(Source: The [Federal Records Act](#) of 1950)

A record is, “recorded information,  
regardless of medium or characteristics,  
made or received by an organization  
that is evidence of its operations  
and has value  
requiring its retention  
for a specific period of time.”



# Definition: "Record"

(Source: National Archives & Records Administration)

A unit of information

Made or received in the course of an activity

Kept on presumption of value

Relevant in subsequent activity **10**

Source of information – what was done/what happened **11**

Known context of creation **12**

- Who created it
- When
- In what activity
- For what purpose



# Vision for records management to support compliance

Provide ***discovery and delivery*** to any ***authenticated user*** with a ***need and right to access***

- Any type of record
- Created using any type of application
- On any computing platform
- From any entity
- ***Now and for the life of the record***



# To meet compliance needs, records must:

## Preserve Information

- Emphasis on richness, completeness
- Enriched by linkage with other information
- Enhanced by authenticity

## Serve as Evidence

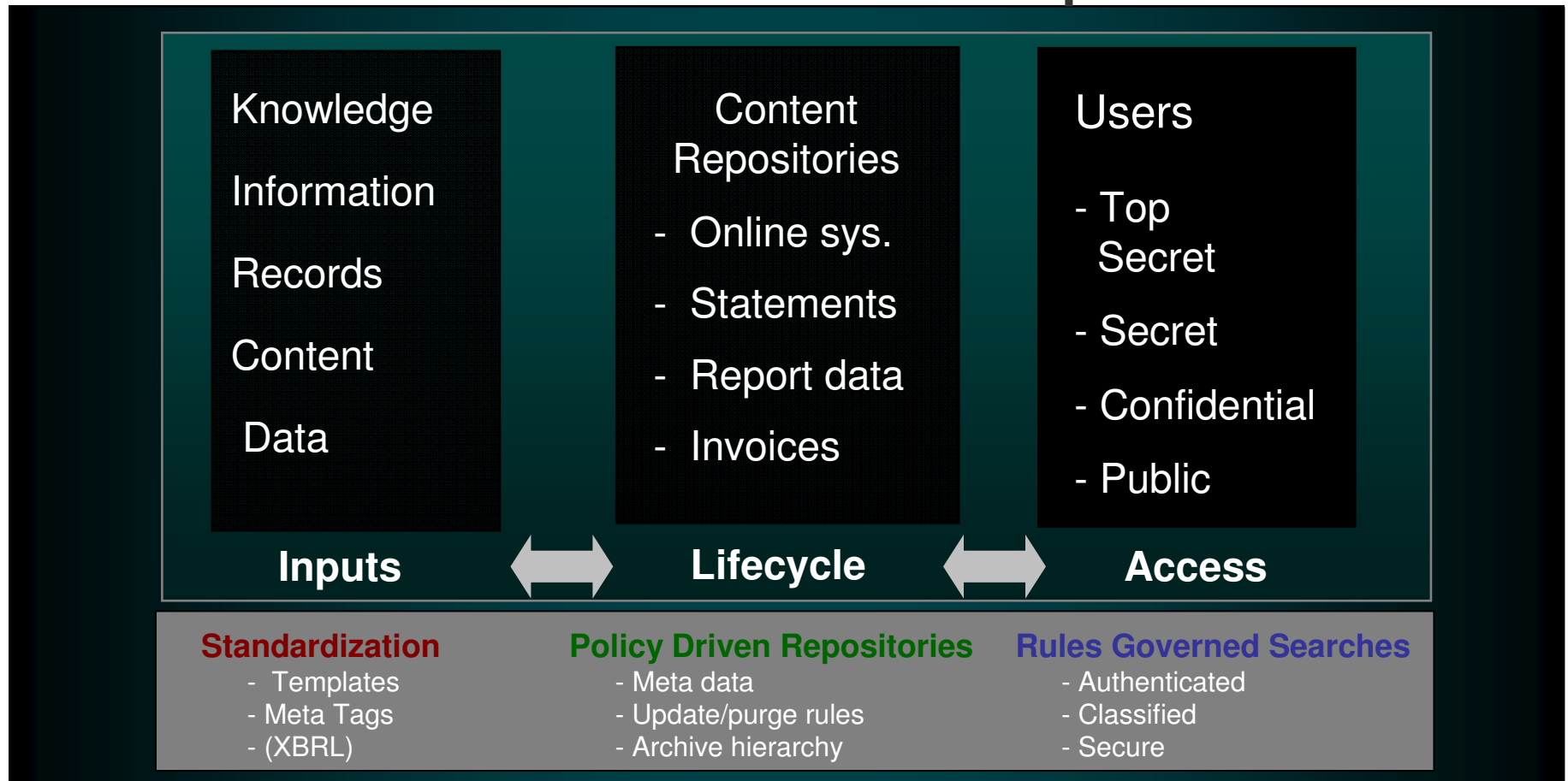
- Emphasis on Authenticity
- Enhanced by proximity to event, 'originality,' quality

## Provide

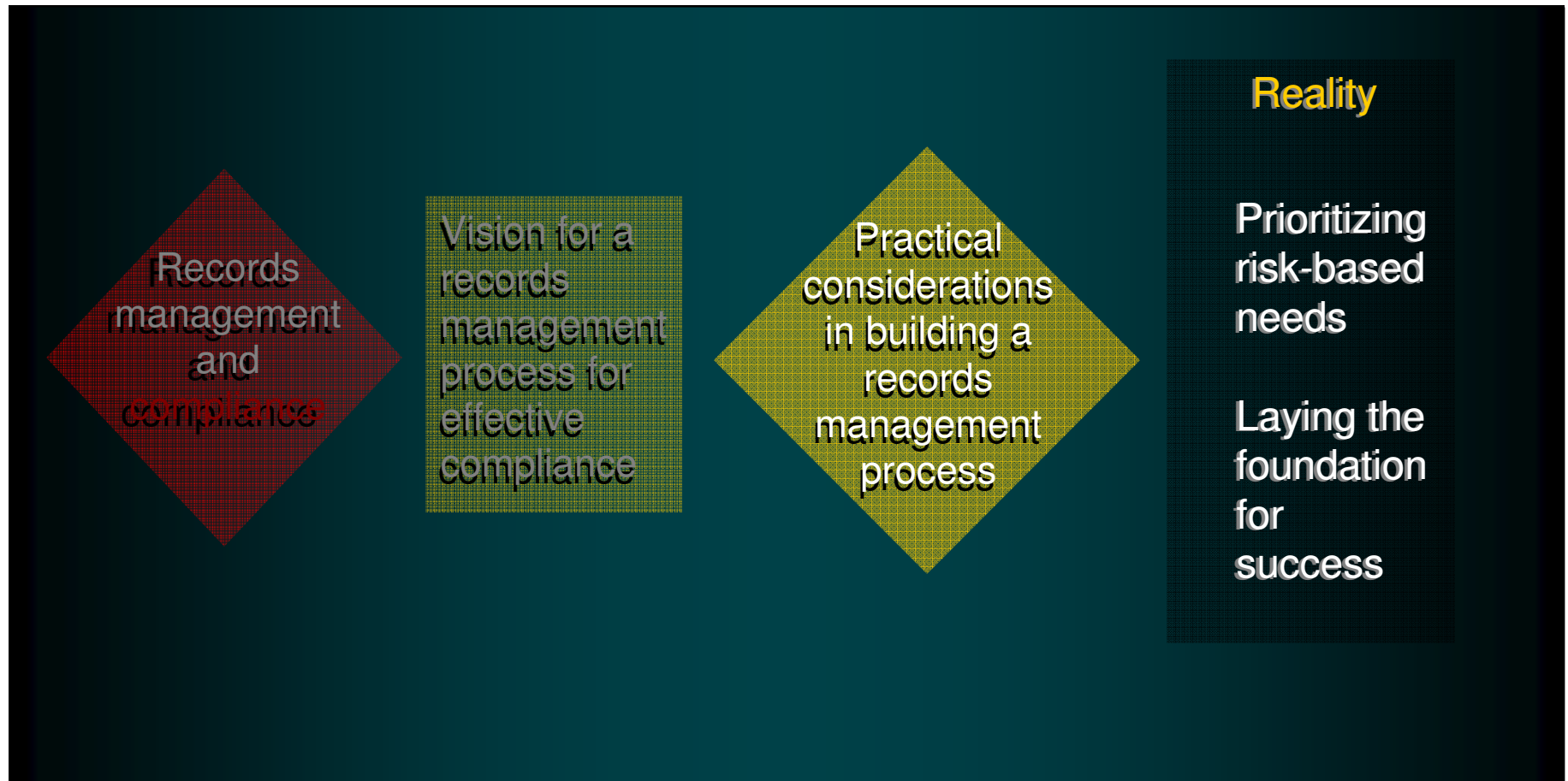
- Context
- Structure
- Content
- Location



# Records Management Framework - Standardization for Compliance



# Focus area #3.



# Reality of electronic records

- Obsolescence - constantly changing technology
- Variety - different types of records
- Complexity - records in different formats
- Distributed - stored in different, incompatible repositories
- Volume - enormous amounts of records
- Scope - global
- Time frame - varied
- Authenticity - assuring the record is what it purports to be



# Reality: project execution

- Obsolescence - constantly changing technology
- Variety - different types of records
- Complexity - records in different formats
- Distributed - stored in different, incompatible repositories
- Volume - enormous amounts of records
- Scope - global
- Time frame - varied
- Authenticity - assuring the record is what it purports to be

Executive sponsorship, strategy, policy, control, funding



# Identify, list, categorize, prioritize - compliance needs

Agencies: SEC, OSHA, EPA, HHS, other

Reports: finance, operations, human resources

Information: location, extraction, security, authorization

Records: structure, location, authorization, encryption

Transformation: Applications, Computations, algorithms

Data: authenticated, quality check, compatibility check, meta-tags

Source: Internal/external, secure, access level, authentic, validation

Integrated Cross-functional Team



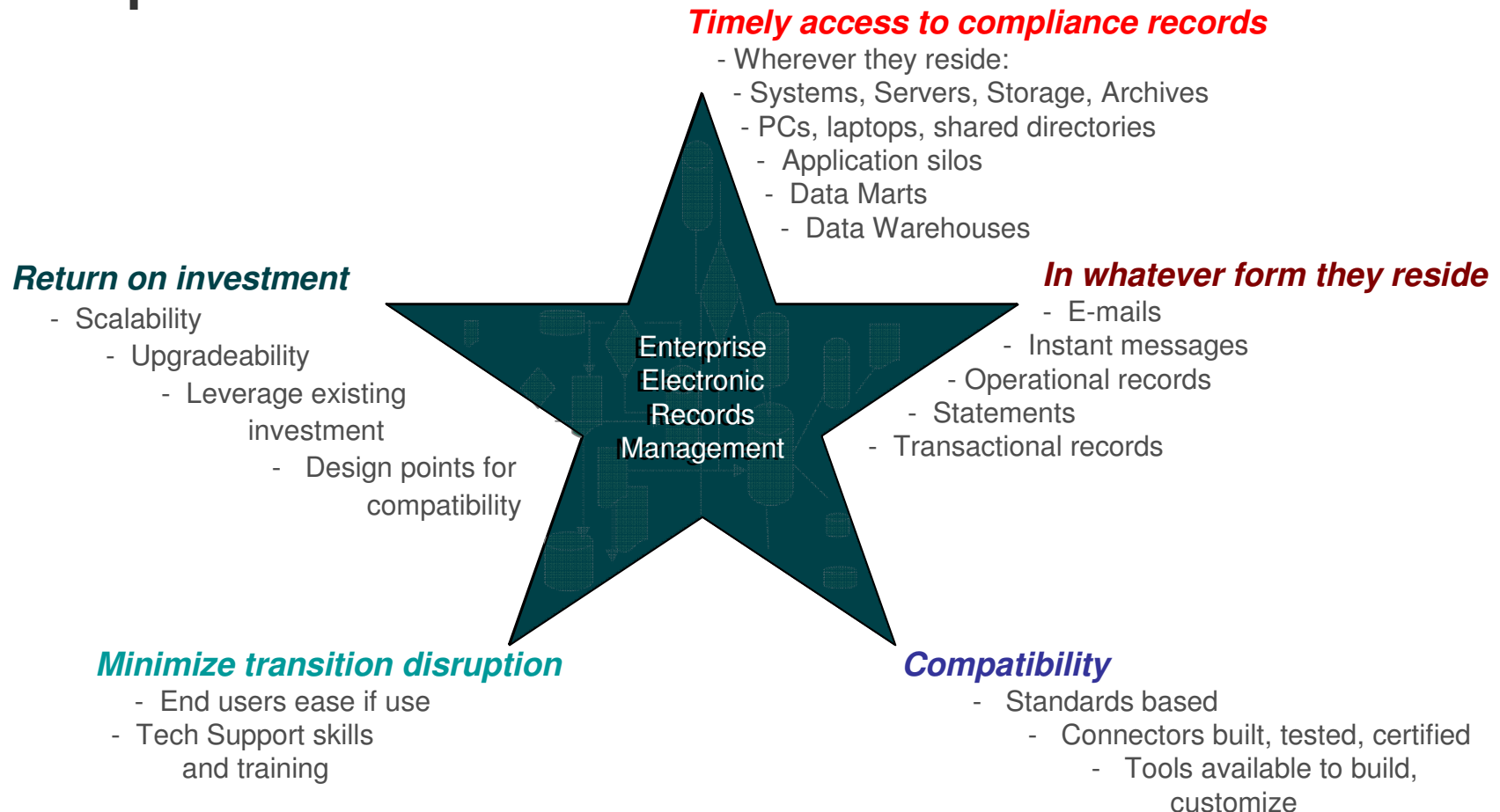
# Risk-profile determines the scope of records management objectives




# Focus area #4.



# Records management criteria for compliance



# Reference – DoD 5015.2



The image shows the cover of the DoD 5015.2-STD document. It features the Department of Defense seal in the top left corner. The title is centered: "DESIGN CRITERIA STANDARD FOR ELECTRONIC RECORDS MANAGEMENT SOFTWARE APPLICATIONS". Below the title, it says "June 19, 2002" and "ASSISTANT SECRETARY OF DEFENSE FOR COMMAND, CONTROL, COMMUNICATIONS AND INTELLIGENCE".

CHAPTER 1 - GENERAL INFORMATION	23
C1.1. PURPOSE	23
C1.2. LIMITATIONS	23
CHAPTER 2 - MANDATORY REQUIREMENTS	24
C2.1. GENERAL REQUIREMENTS	24
C2.2. DETAILED REQUIREMENTS	24
CHAPTER 3 - NON-MANDATORY FEATURES	47
C3.1. REQUIREMENTS DEFINED BY THE ACQUIRING OR USING ACTIVITY	47
C3.2. OTHER USEFUL RMA FEATURES	48
CHAPTER 4 - MANAGEMENT OF CLASSIFIED RECORDS	51
C4.1. REQUIREMENTS FOR RMA SUPPORTING MANAGEMENT OF CLASSIFIED RECORDS	51
C4.2. OPTIONAL SECURITY FEATURES	57

Download from: [www.BIResults.com/Download.html](http://www.BIResults.com/Download.html)



# Benefits of Records management

## Other

- Preserve brand value, execute with confidence
- Cost savings: storage, streamlined infrastructure, ...

## Enterprise wide operational efficiency

- Quicker information access for decision making and operations
- Consistent and equitable delivery of services
- Better documentation available more efficiently
- Supports and documents historical and other research

## Protection and support in litigation (SOX, Basel II, HIPAA, GLB, others)

- Required documentation as evidence
- Continuity in the event of a disaster
- Protects against inappropriate and unauthorized access



# Consistent enterprise-wide recordkeeping can deliver benefits beyond compliance

