

How to Successfully Implement an E-Records Management Program

Recognizing the need for collaboration, the records management and information technology departments of the company highlighted in this case study partnered to implement a successful enterprise-wide electronic records management program.

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Building on its successful implementation of an e-mail management program, the company featured in this case study turned to holistic e-records management.

From its inception, the project's fast pace drove its success. In the first 90 days, the team established the records inventory, records policies and procedures, records retention schedule, and folder structures. During the next 90 days, the team outlined the project structure and deliverables for all the company's e-records, including e-mail and file shares. But the project began with the company's motivation to make changes.

Motivating Factors for RM

Records management (RM) programs are typically created for one of four reasons – the last two being the most common:

- Management embraces RM principles because it wants to manage its records better.

- The organization recognizes that proper RM will give it an advantage over its competitors.

- The organization is unable to locate important records and wants to improve its ability to do so.

- A litigation hold or investigation prompts the organization to focus on RM.

Critical Ingredients for Success

The case study company's project's success was largely due to three things: (1) its level of executive support and resources given; (2) the ability of RM and IT staff to collaborate; and (3) the organization's ability to apply RM policies.

Executive Support

The support from the case study company's executive committee for an e-records implementation strategically placed the RM program in an advantageous light.

However, the RM and IT teams approached the project from differing viewpoints and with an unclear division of responsibilities. To resolve these issues, the teams spent a week with a RM consultant and fashioned a common approach to the project plan of developing an electronic content management system (ECMS) and, as a result, a strong e-records program.

This illustrates that when upper management strongly supports a project by providing a healthy budget, a reasonable scope, and the correct RM resources – and when staff collaborate – it can be successful.

Collaboration

The case study company assigned the RM team as the business owner of the ECMS, while the IT staff became responsible for project management. The program's architecture and imple-

mentation were designed jointly by the two partners.

IT and RM found themselves at odds several times during the development of the architecture. (Interestingly, in the development of the architecture, the ability to apply retention won every time). To resolve the conflicts, the team members deferred to rules agreed upon during their week-long strategy session in which they framed the project and addressed several parameters, including:

- This was not a uniform file classification environment. (A uniform file classification had been attempted earlier but failed when consensus could not be reached.)

- Duplicates would need to be purged from the system. This was accomplished by running an algorithm periodically that looked at several key fields (e.g., date, time, file size, subject, to and from) and ranked them in a Google-like report from 100% to 90%. Accepting a 3% margin of error, the e-mail from the sender was retained (allowing for multiple pointers based on user requirement) and duplicates were deleted.

- Based on how users searched for e-mail, this search needed to be customized, including a way to differentiate if the e-mail had attachments.

- A default folder called “No Fit” was used in every department’s folder structure to guarantee a place for every record.

- A tool called “Send Intercept” was developed to force attributes for each record declared into the repository called the “corporate workspace.”

- Metadata was used to pre-populate attributes where possible, depending on the object type in the system. For e-mail, the subject was automatically populated, as well as the “to,” “from,” “date,” and “attachment” (yes/no) fields. For information from the file shares, it was “creator,” “date,” and “name” fields.

- RM monitored and statistically measured all folders to quantify suc-

Ingredients for E-Records Management Success:

- Executive support
- Sufficient resources
- Collaboration between RM and IT
- Application of records policies
- Training
- Ability to adapt to a changing culture

cess. (RM had predicted for e-mail that 10% would be records and 90% non-records, and for file shares, 80% would be records and 20% non-records. After monitoring, RM determined that the predictions were close: for e-mail, 4% were records and 96% non-records, and for file shares, 84% were records and 16% were non-records.)

- While the environment pointed to the records director as the focus of the project, the consultant emphasized the need to use all talents on the team.

- Contrary to a generally accepted records practice, the records team would not develop or submit lists of records to be destroyed for the department because the company placed the emphasis on what the records department now had custody of. The case study company’s policy – which had been approved by the legal department and outside attorneys – was to get approval from the tax, audit, and legal departments that there were no outstanding holds and that all records subject to legal holds had been secured. Departments only received a courtesy notice concerning the destruction of records.

Application of Policies

Applying records policies sounds simple. However, the nuances of applying policies to all of an organiza-

tion’s records and creating a methodology to search and retrieve the correct record when needed is a major undertaking and requires that changes be made by all employees.

The breadth of change that is necessary for an initiative of this type takes place from two perspectives: from the top down and from the bottom up. It requires executive sponsorship to assist with the trickle-down effects of change management. But it also requires a bottom-up approach. In this case, it was the supervising RM committee – which represented the entire organization – working to ensure that business was not impeded as change was effected. For this implementation, the RM team was able to fashion a compromise to protect users’ ways of working and their unique filing methodologies while adhering closely to the records rules established for the company.

Phase One: Managing E-mail

Due to the high risk factor associated with e-mail, the executive committee designated that record type as first priority. IT agreed that the ECMS was the world in which records policies would be applied, but to them it was just another system. It was RM that promoted business processes and corresponding records to declare into

the repository that propelled the system beyond e-mail.

First, the team embarked on a 30-day training period for the e-mail repository. The finer points of training included:

- What constitutes a record
- How to drag and drop a record from Microsoft Exchange
- How and why declaring an e-mail is a move from the e-mail environment to the ECMS
- The availability to provide remote access and caching when an employee travels
- No personal storage tables (PSTs) were allowed. A PST is a proprietary Microsoft format. PSTs are unstructured data files. Because it is difficult to apply RM principles to them and they create several problems for e-discovery, they were forbidden even before the RM group was created.
- Declaration would be controlled by a 60-day calendar. Because of the large file sizes that the company received in the conduct of business, using a time limit rather than a size limit was preferable for the case study company. This forced users to determine if an e-mail was a record or a non-record and to declare the records into the corporate workspace during the 60-day timeframe.

Phase Two: Managing File Shares

Once e-mail management training was completed, the company's attention turned to the rules of declaration from the shared drives. This proved to be a greater challenge due to the greater volume of records located there and the expectation that as many as 80% would be declared as records.

But the training rules were relatively simple. Unlike e-mail, where declaring an e-mail a record meant moving it from the Exchange server to the corporate work space, declaring a record from the file share meant importing a copy into the corporate workspace. Once the copy was successfully

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made, the user had to delete the original from the shared drive.

When in doubt, employees were instructed to declare the record. As a result, duplicates accounted for 30% to 50% of the records volume in the repository, depending on the business unit.

Duplicate records in different folder locations, however, were acceptable due to restricted access. Because user groups had access only to specific folders, the same record in a different user group's folders was an original to that user group.

**Phase Three:
Learning from Hurdles Cleared**

The project's success was defined not only by how far the team had to travel to full implementation, but also by the hurdles it had to overcome. In this case, the team cleared many hurdles, including those discussed below.

Keeping the Team Focused

As IT's focus wandered and it dedicated its resources to other projects, RM had to work to get its attention back by gaining the confidence of end users and providing objective evidence of the value of the e-records project implementation.

With the help of an offsite scanning service bureau, RM did this by providing front-end scanning at the beginning of all workflows. It performed quality control on 100% of the scanned materials, and once the records were uploaded into the system, the originals were destroyed.

Because accounts payable records were frequently accessed by end users,

the benefits of the ECMS were highly visible. The accounts payable process snowballed into a 95% electronic environment. The success of the accounts payable process expanded to 19 other record types that were heavily accessed, thereby increasing the system usage. With the support of the business units' records in the ECMS, IT was forced to continue implementation.

Measuring Success

The team had to determine how to measure the success of an e-records initiative. It used these criteria:

■ *Qualification Rate:* Were users correctly, appropriately, and consistently identifying those e-mails and documents that are corporate records and should, therefore, be placed under records control? This was expressed as the percentage of total e-mails/documents per user, known to be business records and therefore stored in the repository. Based on best practices, the case study company was looking for an accuracy of 90% or better.

■ *Declaration Rate:* Of the qualified e-mails/documents ("qualified records") that had been identified, were they in fact being declared? Expressed as the percentage of the known qualified records that are physically stored, the company was looking for 90%.

■ *Classification Accuracy:* Did the records that were stored have the correct retention rule applied? This was absolutely critical, as final records disposition and destruction cannot be performed unless the accuracy meets a specified threshold acceptable to

records management. Expressed as the percentage of the total records that are known to have the proper retention rule applied, the accuracy rate typically is in the 98% range. The case study company routinely checked folders to ensure users were declaring records to the proper folder (with the proper retention).

Meeting Collaboration Challenges

As the success of the system grew, the RM group in the case study company shouldered a heavier load and needed additional staff – while the IT staff had less work. For example, the backups ran quicker and smoother because the Exchange server did not have the volume it once did, and the file shares were virtually eliminated. Therefore, the need for several IT positions was reduced, and the very people RM depended upon for the successful maintenance of the system performance were looking at the system as a threat to their job existence. This did not endear the ECMS project to IT.

In fact, at one stage in the project development, wary IT colleagues objected vehemently to the ECMS project in front of management and expressed a wish to replace the ECMS with SharePoint 2007. However, the organization re-committed to the software and re-assigned the IT employees to other projects.

Meanwhile, IT knew how to build the ECMS, but there were definite configuration problems based on its purely technical interpretation of records policies. The databases were not running quickly enough. For example, it took five minutes to retrieve some records when it should have taken five seconds. RM challenged the IT team to disclose configuration problems that kept the system from running at maximum speed, so the RM side of the team used its own project management skills to expose software challenges that IT would not divulge otherwise.

Stressing Requirements, Benefits

During training, the RM team would say, "It's not a question of *if* a company will be sued, but *when* and *how often*." The legal department reinforced that with a motto it advertised throughout the company: "A company never needs records until it needs records."

However, project research showed that only 3% to 10% of the case study company's employees were involved with litigation, so telling employees during training exercises that it was necessary so the company could "meet legal requirements" did not motivate the majority of employees to do the right thing. For them, it was also important to stress how the repository would improve their ability to perform work.

Adapting to a Changing Culture

In the post-e-mail-management phase, the case study company's culture changed, and it began to turn its attention to what it considered more pressing matters. The olive branch offered by management was the records coordinator program and the promise of its positive impact on staff development. It was a pivotal moment in acknowledging the benefits of the RM program and, once again, management's strong support for fully implementing the RM program.

Providing Training

The records team had to provide several customized learning environments. The training program included:

- That records policies and procedures were ISO 15489-compliant
- Classroom and one-on-one records coordinator training program
- Mandatory classroom training at the new hire orientation
- Mandatory records classroom training

- Additional one-on-one training opportunities

- Administrator roles and responsibilities training for RM staff

While the initial training focused on the e-mail management portion only, the aggressive implementation plan meant that the RM team did not get as much time with colleagues as it would have liked to ensure that colleagues understood the nature of a record. Consequently, the records team expanded training requirements to include all records types. It also incorporated the records lifecycle concept that should have been taught from the start to defuse the continuing misunderstanding that the e-mail format itself constituted a record.

Phase Four: Sharing the Recipe for Success

According to Doculabs, 50% of

ECMS implementations are not successful. Although some aspects of the case study company's project could have been done differently, the company has maintained the system for several years and has supporting statistics that prove its success.

One thing is certain: There is no cookie-cutter approach that results in an ECMS implementation's success. The key is to find a recipe that skillfully combines the key ingredients – employees, risk factors, culture, process, and procedures – with an organization that has the vision to see the big picture. **ENB**

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