

Harnessing the Winds of Change



Organizations change constantly. They are subject to reorganization, budget fluctuations, new business processes, new technology implementations, and changing legislation and regulations. Frequently these compel changes to RIM programs. RIM professionals must anticipate and be prepared to lead their organizations through any change that affects information assets.

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Change is the name of the RIM game. Information is constantly being updated, transformed, transmitted, and superseded. Information systems are constantly receiving feeds from internal and external sources. Business processes and procedures change to keep up with the pace of business. Organizations are restructured, causing workers to change their roles and responsibilities. In short, information is rarely stationary. As the old saying goes, “The only constant is change.”

With RIM, the situation is even more complicated. New record types are created as business grows or transforms itself in various ways. Existing record information is modified when record locations, formats, and other metadata change. Modifications to business applications cause different types of records to be generated. Amendments to laws and regulations

change retention requirements. All of this is enough to make one shout, “Stop!” But the pace of information growth does not slow down. In fact, the organization’s information domain keeps growing exponentially.

In a RIM program, change has to be managed at both a proactive and a reactive level. Because RIM professionals often find themselves the point people to address unexpected change issues, they have to develop reactive change controls and processes, as well.

Controls for Records Management Changes

Change management entails involving key players and stakeholders and using a structured approach to implement and minimize resistance to change. With any change management process, the primary concern is to understand the change, assess the

impact on existing processes, and develop ways to either minimize the impact or update existing processes to absorb that change. These are the various types of changes that often occur within a RIM program.

Policy and Procedure Changes

RIM policies and procedures are subject to change and need to be re-evaluated from time to time. Policies and procedures can be updated as a result of major organizational changes, business transformations, annual reviews, audits, legal or regulatory reasons, or any other events that have a material impact on how records are managed within the organization.

Whatever the reasons, every RIM professional should consider developing controls to manage updates to policies and procedures. This requires the RIM professional to:

1. Understand the changes that

need to be made.

2. Conduct a detailed evaluation of the impact of those changes on the day-to-day management of records.
3. Assess the changes that may be required to the record inventories, retention periods, electronic records management systems (ERMs), line-of-business processes, procedures, and business applications.
4. Revise training and communications, as many policy changes can be addressed either by employee communication or a more formal update to the training itself. Employees can either take the updated training immediately or in the next round of annual training certifications.
5. Take a slow-and-steady approach to implementing policy changes that may involve a much broader scope (e.g., if one is adding additional policy requirements or making significant updates to roles and responsibilities). Rolling out all the changes at once is not optimal.
6. Provide the lines of business with ample time to understand and incorporate the updates.
7. Establish a timeline by when each line of business needs to be compliant.
8. Develop training, supporting documentation, cheat sheets, communication plans, brown bags, and “what does this mean to me” type of materials for employees. In a good change management regimen, there is nothing like over-communicating and emphasizing the benefits of each change.

Records Inventory Changes

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tems, processes, and ways of delivering information imply changes in the underlying record information. Records inventories are usually not “static” documents; on the contrary, they are living, breathing documents that need to be managed carefully, following these steps:

1. Update records inventories on an as-needed basis, on a scheduled periodic basis (e.g., quarterly or semi-annually), or a combination of both. The updates should follow a well-defined process with appropriate checks and controls built in. For example, only a few individuals should be allowed access to update inventories. Giving too many people access to the inventories for updating is a recipe for disaster.
2. Establish change control logs. Each change, no matter how trivial, should be logged in the change control log, and it must include the date/time, type of change, reason for that change, who requested and authorized the change, and, where appropriate, affected lines of business.
3. Maintain version history of the inventory, so at any point in time, an individual can determine who made a specific change to the inventory data and why. This is not only very helpful when dealing with large and diversified inventories, but it also makes the process a lot

more consistent and reliable. This is helpful, for example, during an audit, enabling an organization to explain why certain record metadata was deleted or replaced.

4. Use standardized change management templates to document updates to record inventories.

Records Retention Changes

Retention categories, file plans, and retention periods change as new or amended laws and regulations become effective or business retention requirements change. Managing accurate record retention information is the key to any successful RIM program, so the change management processes for records retention need to be emphasized.

A change in the retention requirements may not mean just changing the length of time a record is retained; it may also mean a change in how the record itself is fundamentally managed. For example, if the retention period for a record changes from “current year + 12 years” to “permanent or indefinite,” the best method to store it has to be re-evaluated. In addition, special attention needs to be given to records that were previously maintained under the older retention period. Therefore, for each change to the record retention periods:

1. Evaluate the impact on current retention policies that have been applied to electronic records, file

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room rules, offsite storage rules, record controls, business unit procedures, and disposition schedules.

2. Develop a plan that addresses how each of these items will be managed and who will do the updates, as well as how and when updates will be performed.
3. Publish updates to retention schedules and resulting impact assessments well in advance so changes can be communicated, understood, and incorporated by lines of businesses with minimal disruption.

Business Process Changes

In most organizations, changes to business and operational processes are well managed through a formalized change management process. Change management teams or committees evaluate and approve all modifications, and the change management process contributes updates to the necessary documentation, controls, procedure manuals, training materials, and more.

However, in many cases, there is no tie-back of this formalized change management processes to the RIM process itself, resulting in record inventories being out of sync, records controls being out-of-date, and incorrect retention policies being applied.

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mittee and provide the necessary expertise when analysis of and decisions about various business process changes take place. Of course, it is up to the RIM team to come to the table with a plan for how it will manage changes on its end.

One thing to note: Not every change in a business process will impact RIM, nor should RIM professionals attempt to involve themselves in every business process change. Instead, document the triggers for RIM to get involved. For example, anytime a new record type (or series) is generated, record metadata is modified, retention periods are updated, and record format or locations are changed, this would be a trigger for the records management change process.

Organizational Changes

As the pace of business has accelerated, reorganizations have become more of a norm than an exception. While reorganization notices are often dreaded, they should be welcomed as opportunities for improvement that will help move the organization to greater heights.

For RIM professionals, however, reorganizations usually mean headaches because of their requirements to update record ownership, record locations, records types (with some being split and others being merged or becoming obsolete), ERM access rights, review/approval steps, and so on.

Therefore, RIM teams must develop a process for handling reorganizations. Here are ways to make the transition smoother:

- Stay informed on what is occurring at the organizational level. Sometimes, just finding out what the new organization structure will look like is difficult. HR teams are a good source for updated organizations charts, titles, and roles, so having a friend in that area is always beneficial.
- Since no two reorganizations are the same, RIM teams will have to evaluate them on a case-by-case basis. Evaluate the reorganization's impact to record inventories; record ownerships; record metadata, such as location, retention, policies, and procedures; offsite storage; ERM systems; security and access rights; training; and compliance.
- Develop the appropriate plan to incorporate the changes.
- Attempt to rationalize and minimize the reorganization's impact by grouping changes and scheduling them on a quarterly or semi-annual basis.

Technology and System Changes

Change management for business applications and systems involve two aspects: 1) change to the set of business applications and systems that make up the electronic records universe within an organization; and 2) change to the systems that depend on the application or system that is being changed. For each major system change:

1. Evaluate the release notes and/or discuss with technology leads if the underlying records/record metadata contained in that system or those that get outputted are affected.
2. Document the change to these record metadata noting what metadata values are updated or create new.
3. Develop a plan to manage these

changes to such items as record inventories and retention.

4. Add a RIM step in the system change process so application owners are responsible for completing the relevant forms (e.g., inventory and retention update) using standard templates.

Clearly, system changes are going on all the time, so it is highly implausible that a RIM professional can keep up to date with all of them and make the corresponding updates to the RIM artifacts. Instead, consider scheduling these changes on a semi-annual or annual basis.

Personnel Changes

Personnel changes can impact RIM in several ways, including changes in record ownership, record custodians, lines-of-business records managers, and technology points of contact. RIM professionals must:

1. Determine the list of the “critical path” personnel (e.g., personnel whose leaving or changing roles has a direct impact on the management of organizational records).
2. Determine the appropriate backup and contingency personnel who can take over when necessary. For this to be successful, the backup/contingent personnel must have been adequately trained and made aware of the current state of RIM affairs.
3. Maintain a reasonable level of documentation on how various RIM processes are executed to help support a much easier transition when required. If, for example, a line-of-business RIM professional leaves the organization, there must be at least one person within that line of business who has been designated a backup or has sufficient knowledge of RIM responsibilities.
4. Cross-train key personnel to minimize the risks associated with personnel events.

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Personnel changes are usually sudden and effective immediately, and a proactive change management plan will help ease and support the transition process.

Financial and Budget Changes

While financial and budget changes are not directly related to the core subject of RIM, for obvious reasons it is a crucial aspect of managing the program in any organization. Typically, RIM programs are adequately funded in the beginning (at least in most cases). As time goes by and the program matures, the focus shifts from implementation to maintaining a steady state. This is when the greatest risk of financial and budget changes to the program can occur.

Once record controls are implemented, systems have been built, and personnel have been trained, management may believe it can dial back and lower the funding thresholds. Or, RIM may be viewed by budget committees as low-hanging fruit that is ripe for cost cutting. In other cases, RIM may be viewed as an administrative function and subject to budget adjustments. Whatever the reason, the reality is that most RIM programs face cost cutting from time to time. To prevent a drastic impact to the program, RIM professionals must:

1. Analyze and develop short- and long-term approaches to handle funding allocations scenarios.

Identify the funding that must absolutely be available for the RIM program to exist and determine which other areas may not be considered core.

2. Identify what activities could be cut to reduce the RIM budget requirements. Potential areas may include not providing RIM services to lines of business, using less-expensive alternative vendors, finding less expensive storage, introducing more automated – or, as the case may be, manual – controls, reducing service level agreements, and using open source technologies.
3. Create a change management plan that articulates what to do when requested funding does not come through; it is truly vital to the long-term sustainability of the program.

Managing the Unexpected

Managing change in a RIM program is not easy. With proper foresight and good planning, RIM professionals can minimize and mitigate the impact of these changes. Thinking and being mentally prepared for both expected and unexpected situations will help ensure a successful RIM program. **END**

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