

STANDARDS:

Building Blocks for a Strong RIM Program

Multinational organizations require records retention programs that are founded on the international records management standard and ensure global coverage

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Because the advent of standards is a relatively recent phenomenon in the records and information management (RIM) profession and most records managers have not operated in standards-driven environments, the realization of both the significance of standards and how to apply them has been slow in coming. Like other professional standards, the records management standards, if correctly applied, lead to results that are consistent, predictable, and desirable. This article focuses on translating segments of several records management standards to develop foundational components of a RIM program. Working together, ISO 15489 and certain ANSI/ARMA standards provide guidance and direction in developing elements of a comprehensive RIM program and improving existing programs using the best thinking in the RIM field as contained in the standards.

Why Use Standards?

In scientific and technical fields, it is common to mention in research reports that certain practices were followed according to a particular standard. Moreover, international standards transcend geographical boundaries. Such an attestation provides credence to the practice, whether it is a chemical analysis, a particular test method, or a calibration procedure. Many product specifications require adherence to such technical and

At the Core

This article

- ▶ Explains the importance of standards in developing a complete RIM program
- ▶ Provides guidance about how to apply standards to problems faced by RIM professionals
- ▶ Describes important elements of the standards and how to use them to improve existing programs or develop new ones

scientific standards, thus leading to a systematized approach and one that is replicable (i. e., scientific).

Following standards also leads to a commonality of understanding across industry and organizational types. If a testing laboratory states that it has conducted a specific test according to, say, an American Society for Testing and Materials standard, those who review the results immediately understand the protocols that were followed, and this provides validity to the test results themselves. The protocols in the testing procedure were determined by a relevant body to be the “standard” method for conducting that particular test.

Standards carry more weight than best practices. While best practices may be useful points of comparison, they actually carry authority only for their

own organization. They represent the viewpoint of that organization and its culture, business requirements, and practices. By contrast, standards are requirements, voluntarily agreed upon by professionals and experts representing officially sanctioned national and/or international bodies, whose job is to oversee the development of external, non-biased, and broadly applicable requirements.

As a profession, RIM essentially operated without standards until 2001, when *ISO 15489-1 2001: – Information and Documentation – Records Management – Part 1: General* was issued. This was a major groundbreaking event for the entire profession. This international standard was followed in quick succession by the issuance of five ANSI/ARMA standards that address key records management functions:

- *Records Center Operations* – ANSI/ARMA TR-01-2002
- *Vital Records Programs: Identifying, Managing and Recovering Business-Critical Records* – ANSI/ARMA 5-2003
- *Requirements for Managing Electronic Messages as Records* – ANSI/ARMA 9-2004
- *Retention Management for Records and Information* – ANSI/ARMA 8-2005
- *Establishing Alphabetic, Numeric and Subject Filing Systems* – ANSI/ARMA 12-2005

Figure 1: Gap Analysis: Comparison of Existing RIM Components With ISO 15489 Elements

Component	Areas to Measure	Current Status/Practice?
Records Technologies	Which technologies should be used?	
Risk Management	What risks would emerge if records did not exist?	
Audits	Are they undertaken on a regular basis?	
Information Use	What are the users' needs?	
Inactive Records	Is cost-effective storage used? Can service levels be improved?	
Retention Schedule	Are records kept only for as long as needed?	
E-Records	Are traditional RM principles being applied to your electronic records?	
Retrievability	How are records to be organized? What are the requirements for retrieving, using, and transmitting records?	
Records to Be Created	What information is to be in them?	
Training	Are new employees provided training on RIM practices?	
Vital Records	Are records kept in safe and secure environment?	
Legal/Regulatory	Does the records retention schedule meet all known requirements and organizational policy?	
Destruction	Is it authorized, systematic, and documented?	

In combination, the ISO and ANSI/ARMA standards define the key elements of a records management program and outline more specific requirements for each of the program elements.

Practically Applying Standards

Before deciding which standards to apply, it is important to understand the organization's overall goals and to assess how RIM can contribute to those goals. It is equally important to establish a baseline of an organization's RIM program – what exists in the current RIM configuration, what does not exist, and what needs to be strengthened. Conducting a gap analysis grounded in program goals, corporate strategy, and organization focus, provides such a baseline. [See Figure 1, above: Gap Analysis.]

The following sources, among others, assist in identifying program elements that should be in place: ISO 15489, Part 1, selected records management textbooks, and ARMA International's *Advanced Records and Information Management* home study course. In comparing what exists with what should exist, assessment tools, such

as activity lists, checklists, and so forth are helpful. One such checklist is ARMA's *Risk Profiler Self-Assessment for RIM*, which uses ISO 15489 as the foundation for a program self-assessment. Other checklists can be located on the Internet or can be developed in-house by extracting key requirements from the text of the standard. Once gaps are identified, goals should be prioritized based on the following criteria:

- Is there a RIM emergency that must be addressed, such as litigation or an investigation?
- Can RIM be a key contributor to the goals and initiatives enunciated by the chief executive officer (CEO) and other executive managers?
- Are there new RIM requirements imposed by recent legislation or legal mandate, such as the Sarbanes-Oxley Act (SOX), the Health Insurance Portability and Accountability Act (HIPAA), or privacy legislation?
- Are any core program elements missing, such as a RIM policy, a

retention schedule, or a vital records and disaster recovery program?

Once the RIM unit understands the organization's priorities, has identified the gaps in the existing program, and defined which gap(s) have top priority, it is time to select the standards most applicable for the situation. The balance of this article focuses on using standards for four different types of efforts:

- Developing policies
- Developing procedures
- Establishing an overall implementation process
- Continuously improving the RIM program

Developing Policies from Standards

In using standards for practical application, it is important to begin by understanding the text of the standards and extracting the needed requirements and recommendations. This should be followed by a review of existing policies and procedures to determine if they cover what the standards require. This process is a more detailed comparison of

requirements specific to a program element. At this point, policies and procedures can be developed or revised, incorporating additional, unique requirements that best fit the given corporate culture and practices.

ISO 15489-1 2001: – Information and Documentation – Records Management – Part 1: General

Developed through an international consensus of a worldwide federation of national standards institutes from 153 countries and created by experts in the field, ISO 15489 establishes a framework for a holistic RIM program. Similar in organization to other ISO standards, ISO 15489 consists of two parts: Part 1 is the standard proper. It specifies the concepts and elements comprising RIM, and it “defines the necessary results or outcomes to be achieved.” Part 2 “provides one methodology for implementation,” including informative details about the elements specified in Part 1. Part 2 also supplements the standard with tools useful to practitioners and points to the need to identify additional local resources and requirements. In other words, Part 1 specifies what **should** exist, and Part 2 describes **how to implement** the requirements in Part 1.

Part 1 provides an itemized list of higher-level RIM program requirements easily understood by senior management, itemizes elements of the program, summarizes a design and implementation methodology, and provides a succinct description of the RIM processes and controls that should be developed. In addition, it provides a rationale for inclusion of elements, as well as a rationale for the methodology, processes, and controls that are described.

Part 1 can be used to develop an overarching records management policy, a job description for a RIM professional, and records management criteria that can be used in working with information systems (IS) professionals to establish a solid electronic RIM program construct.

Part 1, Section 7.1 in ISO 15489 enumerates 11 program elements that define the RIM profession and comprise a com-

prehensive RIM program. These 11 elements identify RIM as a holistic, unique profession and, in its entirety, this section can be used to form the foundation of RIM policy. [See Figure 2: Elements That Define Records Management Programs.] Basing the policy statement on the 11 elements serves multiple purposes:

- It introduces RIM to other information management functions in the organization.
- It clearly identifies the profession as discrete and distinct, one with functions that do not overlap any other function in the organization.
- It educates the organization at large – all employees at all levels – about those functions comprising RIM.

Section 6.3 of the standard can be added to these 11 elements to define levels of responsibility and authority for developing, supporting, and implementing the RIM program:

1. Records management professionals are responsible for all aspects of records management, including the design, implementation, and maintenance of records systems and their operations and for training users on records management and records systems operations as they affect individual practices.
2. Executives are responsible for supporting the application of records management policies throughout the organization.

Figure 2: Elements That Define a Records Management Program

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

Source: ISO 15489-1 2001: – Information and Documentation – Records Management – Part 1: General (Section 7.1)

3. Systems administrators are responsible for ensuring that all documentation is accurate, available, and legible to personnel when required.
4. All employees are responsible and accountable for keeping accurate and complete records of their activities.

Additional Standards for Policy Development

In addition to an overarching RIM policy, there may be a need for policies that address a particular program element, such as retention and disposition management or e-mail management. In that case, the following standards will be of assistance.

Retention Management for Records and Information – ANSI/ARMA 8-2005

In addition to using the ISO 15489 standard to craft a RIM policy, it is possible to craft policies based on the retention standard – ANSI/ARMA 8-2005. This standard actually includes a sample RIM policy statement in its entirety in its Appendix A. The sample policy includes policy purpose, details of program requirements, roles and responsibilities, and a delineation of RIM program elements and benefits to be derived from the program. It is often necessary to modify such examples, however, so that the policy:

- Fits the organizational culture
- Addresses its RIM-specific goals
- Considers the size and complexity of the program
- Takes into account the resources allotted to create and manage the program

Requirements for Managing Electronic Messages as Records – ANSI/ARMA 2-2004

The purpose and scope of this standard differ from the other ANSI/ARMA standards and from the ISO 15489 standard. Whereas the other standards were developed to provide requirements and/or recommendations for managing records (ISO 15489) or for developing RIM program elements, this standard was created to “define requirements for developing a corporate policy for manag-

ing information content in electronic messages.” Because of this purpose, it

- Includes recommendations about those functions that should be represented in the makeup of the policy development team
- Outlines topics to include in the policy, such as security, compliance, and encryption
- Offers a section on content management that addresses attachments, copies, and threads
- Provides in Appendix A a recommendation of provisions that should be included in an electronic messaging policy. Although it does not provide a straightforward sample of an electronic messaging policy, the “Recommended Provisions” provided in the standard can be combined with language from the standard itself to craft a solid, workable policy for electronic messages.

Developing Procedures from Standards

Standards are also useful for developing RIM procedures on at least two levels. High-level procedures can be developed for others in the organization to understand how the process works and what employees’ responsibilities are in satisfying RIM-related requirements. Procedures can also be developed as more detailed work instructions for the RIM staff itself to document how specific functions and activities are performed. It is common to have both types of RIM procedures in an organization. Prior to crafting the procedure, it is necessary to determine the objective of the procedure and to identify the audience. These are the sections of specific ANSI/ARMA standards that lend themselves to retention procedure development:

- *Retention Management for Records and Information – ANSI/ARMA 8-2005 – pages 17 and 18*
- *Vital Records Programs: Identifying, Managing and Recovering Business-Critical Records – ANSI/ARMA 5-2003 – Section 4 includes the elements*

of a vital records program and indicates which procedures should be developed but does not flesh it out.

- *Establishing Alphabetic, Numeric and Subject Filing Systems – ANSI/ARMA 12-2005 – Depending on the filing method selected, one can use the description (procedure) nearly verbatim.*

Developing Retention Program Procedures

Appendix A of the standard *Retention Management for Records and Information – ANSI/ARMA 8-2005* – presents broad procedures for the most frequent requirements, such as records retention schedules, files transferred to the records center, and others. These procedures are written for non-RIM staff – for the organization-at-large.

Also, in this retention standard, a flowchart, entitled “Records Retention Schedule Development Process” depicts each step in the process. [See Figure 3 on page 34 – Records Retention Schedule Development.] This diagram can serve as the springboard for several retention procedures:

1. From this flowchart, a broad, overarching retention procedure can be developed for the purpose of describing the entire process to a non-RIM audience.
2. Each step can be fleshed out into a working instructional procedure for RIM staff, where the actual activities for conducting that step are delineated.

In addition, certain flowchart steps have corresponding detailed descriptions in the text of the standard, explaining how to conduct that step. Such is the case with the flowchart step “Disposal of Records.” The corresponding text in *Retention Management for Records and Information*, Section 10 – Disposition Procedures – is detailed, thorough, and inclusive. It can serve as the model for how RIM staff should conduct disposition. The same holds true for the flowchart step “Perform retention analysis –

research appraisal of data.” Several corresponding text sections in the standard (Sections 7.4 and 7.5) provide thorough explanations of the analysis and appraisal process, including how to determine information values of records (operational, vital record, legal/regulatory, fiscal, historical) and the criteria for defining each category.

Developing Vital Records Program Procedures

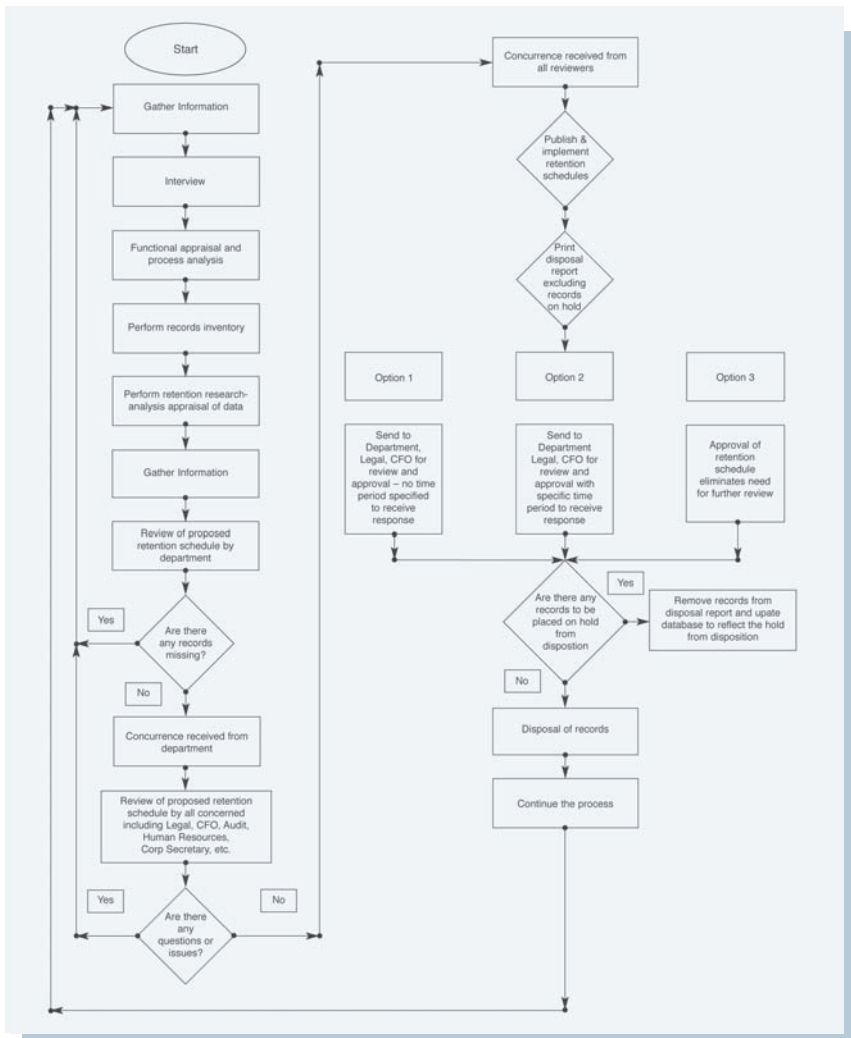
Another useful ANSI/ARMA standard here is *Vital Records Programs: Identifying, Managing and Recovering Business-Critical Records* – ANSI/ARMA 5-2003. This standard lists elements that should be included in a vital records program (Section 4), and by so doing indicates which procedures should be developed. [See Figure 4.] As is the case with the retention standard, some of the required elements for vital records are described in enough detail so that they lend themselves easily to procedure development. The section on “Risk Management Process” is one such area, covering “Records Risk Assessment,” “Site Survey,” “Records Risk Analysis,” and “Organizational Records Impact Analysis.”

Developing Job Descriptions

Another valuable application of the ISO 15489 standard is the development of a job description for a RIM professional. The following list of responsibilities and duties (found in Part 1, Section 4) can be adapted and combined with the segment of Section 6.3 presented earlier in this article:

1. Setting policies and standards
2. Assigning responsibilities and authorities
3. Establishing and promulgating procedures and guidelines
4. Providing a range of services relating to the management and use of records
5. Designing, implementing, and administering specialized systems for managing records

Figure 3: Records Retention Schedule Development



Source: *Retention Management for Records and Information* – ANSI/ARMA 8-2005

6. Integrating records management into business systems and processes

Using Standards to Develop an Implementation Process

Whereas Part 1 of ISO 15489 provides guidance on managing records, Part 2 is an implementation guide, providing one methodology for facilitating the implementation of the standard proper, Part 1. That methodology, depicted in Figure 5, is referred to as *DIRS – Design and Implementation of Records Systems*. DIRS is systematic in approach and incorporates elements of gap analysis, systems analysis, business process redesign and reengineering and translates into concrete records management

practice. As the standard emphasizes, it is important to understand that the DIRS methodology is not necessarily linear. The itemized phases and tasks “can be undertaken in different stages, partially or gradually, in accordance with organizational needs, formal compliance requirements, and changes to the organization’s records management environment.” The DIRS methodology can be combined with the gap analysis previously discussed [See Figure 1] for determining what records management elements are lacking but should exist in the organization.

DIRS lends itself to rich interpretation and application. When most fully described, it provides the theoretical framework for an idealized process of

establishing a RIM program. However, it is useful to understand the logic of the approach, since the logic can be applied in a variety of concrete ways to create a new program or to enhance an existing program. By combining DIRS with subject-specific ANSI/ARMA standards, the DIRS framework can also be used to develop specific program elements, such as a vital records program or an e-mail policy and program. The following example illustrates how to combine a specific standard, *Vital Records Programs: Identifying, Managing and Recovering Business-Critical Records* – ANSI/ARMA 5-2003, with the DIRS methodology in the ISO 15489 standard to design and develop a vital records program. (This same logic can be followed in developing other RIM program elements.)

Vital Records Program Example
DIRS Step A – Conduct a preliminary investigation.

A “preliminary investigation” would be conducted to determine if any elements of a vital records program exist in the organization and if those implemented elements are effective. The program elements would be gleaned from the vital records standard, itemized in Section 4. [See Figure 4.]

DIRS Step D – Assess the existing systems.

In this step, the program elements itemized in Section 4 of the vital records standard would be compared with the current practices in the organization to reveal gaps between what the vital records standard specifies should be in place and what actually exists.

DIRS Step C – Identify the requirements for records.

Replace the word “records” with the phrase “vital records program elements.” This is a clear result of the two previous steps, wherein the requirements would be identified.

DIRS Step E – Identify strategies to satisfy the requirements.

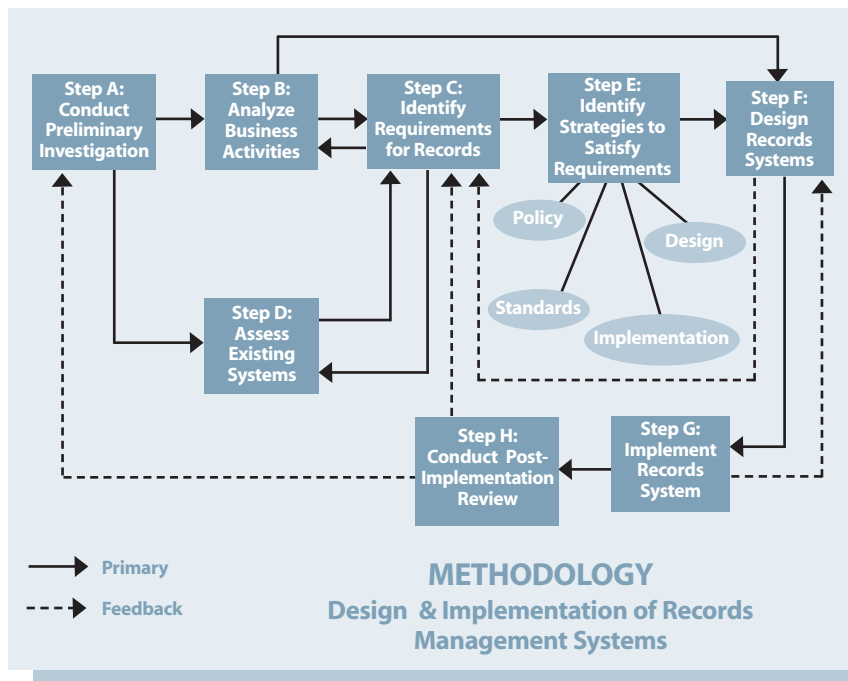
Using the vital records standard,

Figure 4: Vital Records Program Elements

- Assignment of program responsibilities
- Completion of the risk management process
- Identification of all records that are necessary to protect assets, protect legal and financial status, preserve rights and obligations of employees, customers, stockholders, and citizens, and ensure continuity of business operations
- Identification of vital records
- Development of strategies to ensure protection and timely recoverability of vital records
- Selection of methods of protection and locations of remote storage
- Development of procedures and practices to be followed to protect these records
- Development of procedures to permit effective use of selected records in an emergency
- Preparation of a vital records schedule
- Documentation of the program policy and procedures
- Training of representatives from involved portions of the organization

Source: *Vital Records Programs: Identifying, Managing and Recovering Business-Critical Records* – ANSI/ARMA 5-2003

Figure 5: Methodology



Source: ISO/TR 15489-2 2001: *Information and Documentation – Records Management – Part 2.*

determine what needs to be done to enhance the vital records program. A policy may need to be written – as well as a design plan and a roll-out implementation plan – replete with project phases and timelines that will need to be developed.

DIRS Step F – Design the records system.

Replace the words “records systems” with the words “vital records program.” Using the vital records standard as a guideline, determine how the program requirements will actually work. For example, how will the risk management process be completed? Who will be responsible for completing it?

DIRS Step G – Implement the records system.

Replace the words “records system” with the words “vital records program.” This step puts into action the necessary program elements, such as “identification of vital records,” selection of methods of protection, and so forth. [See Figure 4].

DIRS Step H – Conduct the post-implementation review.

This step encompasses evaluation of the process to determine how the vital records program is performing and to identify areas for improvement.

Using Standards for Continuous Improvement

RIM programs must remain aligned with the organization’s goals and must reflect changes in its industry and in regulations to be most effective. Businesses change; new business units may be developed, and new processes or activities usually accompany such changes. The RIM program must be evaluated periodically to determine if it meets new organizational needs. New regulations may be developed that have an impact on records compliance activities. New standards may be issued, and current standards may be revised. Any of these events should trigger a re-evaluation of the RIM program to determine if changes are required to accommodate

the new requirements. As a result, the records management program will be in a continuous state of review, evolution, and improvement – adjusting to the changes, incorporating new requirements, and being strengthened in the process.

Putting It into Action

The advent of both international and national-level RIM standards provides a series of practical tools to help RIM professionals ensure that their programs provide added value to organizations

and are comprehensive. ANSI and ISO standards can add credibility to RIM professionals’ efforts to enhance their programs and contribute to the organization because these standards are developed in an objective and broad-based manner. RIM standards identify both requirements and actions or activities appropriate to achieve the stated goals of the standard. RIM managers should adapt these standards to their own organizations, recognizing that organizational culture and/or additional requirements may need to be accommodated. ■

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