The Principle of Accountability –
A Records Manager Is Not Enough

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Learning Objectives

Upon completion of this session, participants will be able to:

• Summarize the Principle of Accountability and its implications

• Identify the requirements needed to achieve organizational compliance with the Principle of Accountability
Learning Objectives

Upon completion of this session, participants will be able to:

• Utilize the Information Governance Maturity Model to assess the organization’s compliance with the Principle of Accountability and identify action items for enhanced compliance

What We Will Cover

• A brief history of the Generally Accepted Recordkeeping Principles®
• The Principle of Accountability in detail
• Requirements of the Principle of Accountability
• Using the Information Governance Maturity Model to assess compliance with the Principle of Accountability
A Brief History

• Generally Accepted Recordkeeping Principles®

• Published in Spring 2009

• Modeled after GAAP

• Comprehensive, yet general

A Brief History

• Developed from:
  – Combined experiences of the Development Committee:
    • Jim Coulson
    • Patrick Cunningham
    • Galina Datskovsky
    • Lenore Greenberg
    • John Montañá
    • Fred Pulzello
    • Rick Sterling
    • Marilyn Biers
    • Bob Tillman
A Brief History

• Developed from:
  – Incorporation and application of the existing and extensive body of national and international standards and guidelines, current litigation trends, and case law
  – Recommendations and input of the 11,000+ ARMA International professional practitioners

A Brief History

• The eight Principles:
  – Principle of Accountability
  – Principle of Transparency
  – Principle of Integrity
  – Principle of Protection
  – Principle of Compliance
  – Principle of Availability
  – Principle of Retention
  – Principle of Disposition
Principle of Accountability

“An organization shall assign a senior executive who will oversee a recordkeeping program and delegate responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure auditability.”

Principle of Accountability

- The senior executive in charge should establish a method to design and implement a structure to support the recordkeeping program
- Governance structure should be established for program development and implementation
Principle of Accountability

• Necessary components include an accountable person and a developed program

• A recordkeeping program should have documented and approved policies and procedures to guide its implementation

Principle of Accountability

• Auditability enables the program to validate its mission and be updated as appropriate
Requirements

• What are requirements?
  • “…constraints, demands, necessities, needs, or parameters that must be met or satisfied”
    (Dictionary.com [iPad edition])
  • “…statutory or regulatory requirements, or administrative directives that define the obligations for the creation and maintenance of records by an organization”
    (ARMA International)

Requirements

• What are requirements?
  – Constraints, demands, necessities, needs or parameters that must be met or satisfied for the creation and maintenance of records by an organization
Requirements

• Why identify Generally Accepted Recordkeeping Principle® requirements?
  
  – Enhance understanding by “simplifying” the language of RIM
  
  – Synthesize extensive body of standards, best practices, and requirements in an easily “digestible” format

Requirements

• Why identify the requirements?
  
  – Result in a customized recordkeeping solution when combined with the unique needs and circumstances of an organization
Requirements

• Authority
  – Force/make change
  – Assign, delegate, and hold responsible
  – Obtain and distribute resources

• Documented processes
  – Well constructed
  – Regular review with appropriate approvals when needed

Requirements

• Authority
  – Who needs to be involved?
  – What level do they need to be?
  – Obtain and distribute resources
Requirements

• Documented processes
  – Well constructed
  – Regular review with appropriate approvals when needed

Requirements

• Audits & remediation
  – Reinforce compliance
  – Identify weaknesses and gaps
  – Establish plans to address identified issues
  – Demonstrate compliance
The IG Maturity Model

- Creates a more complete picture of what effective information governance looks like
- Assists in conducting a preliminary evaluation of recordkeeping programs and practices

The IG Maturity Model

- Used to evaluate:
  - Gaps between current practices and desired level of maturity for each principle
  - Risk(s) to the organization, based on biggest gaps
  - Whether additional information and analysis is needed
  - Processes for the development of priorities and assignment of accountability for further program development
The IG Maturity Model

• Five levels
  – Level 1: Sub-standard
  – Level 2: In Development
  – Level 3: Essential
  – Level 4: Proactive
  – Level 5: Transformational

• Achieving all 5’s may not be necessary or possible

Why not GAIGP?

• What is Information Governance?
  – “the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals” (Gartner)
Why not GAIGP?

• What is Information Governance?
  – “a holistic approach to managing and leveraging information for business benefits and encompasses information quality, information protection and information life cycle management” (IBM)

• What is Information Governance?
  – addresses all phases of the information life cycle
  – incorporates privacy attributes, electronic discovery requirements, storage optimization, metadata management,…
Why not GAIGP?

• RM v. IG?
  – Records Management (recordkeeping) is the foundation that Information Governance is built upon
  – Records Management and Information Governance are a continuum
The IG Maturity Model & The Principle of Accountability

- **Level 1: Sub-standard**
  - No senior executive (or person of comparable authority) is responsible for the records management program
  - The records manager role is largely non-existent or is an administrative and/or clerical role distributed among general staff

The IG Maturity Model & The Principle of Accountability

- **Level 2: In Development**
  - No senior executive (or person of comparable authority) is responsible for the records management program
  - The records manager role is recognized, although s/he is responsible for tactical operation of the existing program
The IG Maturity Model & The Principle of Accountability

**Level 2: In Development**
- In many cases, covers paper records only
- The IT function or department is the *de facto* lead for storing electronic information, but this is not done in a systematic fashion
- The records manager is not involved in discussions of electronic systems

**Level 3: Essential**
- The records manager is an officer of the organization and is responsible for the tactical operation of the ongoing program on an organization-wide basis
- The records manager is actively engaged in strategic RIM initiatives with other officers of the organization
The IG Maturity Model & The Principle of Accountability

• **Level 3: Essential**
  - Senior management is aware of the program
  - The organization has designed specific goals related to accountability

• **Level 4: Proactive**
  - The records manager is senior officer responsible for all tactical and strategic aspects of the program
The IG Maturity Model & The Principle of Accountability

• **Level 4: Proactive**
  – A stakeholder committee representing all functional areas and chaired by the records manager meets on a periodic basis to review disposition policy and other records management-related issues
  
  – Records management activities are fully sponsored by a senior executive

• **Level 5: Transformational**
  – The organization’s senior management and its governing board place great emphasis on the importance of the program
  
  – The records management program is directly responsible to an individual in the senior level of management OR…
The IG Maturity Model & The Principle of Accountability

• **Level 5: Transformational**
  - A Chief Records Officer (or similar title) is directly responsible for the management of the program and is a member of senior management for the organization
  - The organization’s stated goals related to accountability have been met

Questions?

If you have questions for Jason e-mail jasoncstearns@mac.com or education@armaintl.org.

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