

# Getting to GARP

## ARMA establishes eight management principles.

By **Fred Pulzello**

Litigation and compliance professionals are painfully aware of the need to manage information at an organizational level to mitigate risk during discovery. In short, credible records help sustain a defense. Without adherence to recordkeeping standards and principles, organizations can face not just compliance failures, but can inadvertently mask improper or illegal activities.

Records must be created, organized, secured, maintained, and used in a way that effectively supports the organization's activities, including documenting compliance with applicable laws, regulations, and standards. Effective systems can help day-to-day operations, support budgeting and planning, and help organizations answer questions about past decisions and activities.

But these goals can be fulfilled only if recordkeeping is an objective activity, insulated from individual and organizational influence or bias. To achieve this transparency and accountability, organizations must adopt objective records and information management (RIM) standards and principles.

### THE GENESIS OF GARP

ARMA International ([www.arma.org](http://www.arma.org)) is a not-for-profit professional association that addresses records management (both paper and electronic). Established in 1955, its 11,000 members include records managers, corporate librarians, legal professionals, IT managers, and others, in a wide range of industries, such as government, legal, financial services, and health care. Its members hail from the U.S., Canada, and more than 30 other countries. The association develops and publishes records management standards and guidelines.

In the absence of a single guiding set of recordkeeping principles, companies have struggled to establish effective information governance policies and procedures. Recognizing this — and predicting the potential pitfalls of hastily crafted laws and regulations to respond to the recordkeeping irregularities that contributed to the recent financial collapse — early this year ARMA developed eight "Generally Accepted Recordkeeping Principles."

RIM, legal, and IT professionals reviewed and distilled global resources, such as the international records management standard (ISO15489-1 Information and Documentation — Records Management),

privileged, secret, or essential-to-business-continuity records and information.

- The principle of *compliance* requires an organization's recordkeeping program to comply with its own policies, as well as with applicable laws and binding authorities.

- To demonstrate the principle of *availability*, an organization must be able to retrieve needed information quickly, efficiently, and accurately.

- The principle of *retention* requires an organization to maintain records and information as long as needed to meet legal, regulatory, fiscal, operational, and historical requirements.

- In accordance with the principle of *disposition*, an organization's records and information that are no longer required to be maintained by law or policy must be disposed of securely and appropriately.

- To comply with the principle of *transparency*, an organization's recordkeeping processes must be documented so they are understandable, and the documentation must be available to appropriate parties.

### THE DEMAND

Court rulings in multiple jurisdictions have established that records must be kept in accordance with legal requirements, and be accurate and properly retained. GARP provides a road map to meet those criteria.

Its principles apply to both public- and private-sector organizations of all sizes and in all industries, including those with multinational operations.

Using the GARP principles as a foundation for information governance requires collaboration among records and information management, legal, IT, and other stakeholders. Understanding these principles is integral to implementing technology that meets records management and legal requirements. Without that understanding, organizations may be unable to delete records from an electronic system at the appropriate time, if at all. Retaining this data may pose unnecessary risks and expense to the company.

With additional regulatory oversight imminent, GARP provides a framework for crafting legislation that provides clear guidance — as well as providing a tool to assure legislators and regulators that adopting organizations are likely to be in compliance.

ARMA International also is developing a GARP Maturity Model to help organizations assess and measure their level of adherence to each principle, as well as evaluate risks, and calculate their return on investment. **LTN**

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U.S. federal court case law, and American national standards. The proposed guidelines then were vetted through a public comment process.

### PRINCIPLES

Here is a summary of the resulting eight principles:

- The principle of *accountability* requires a senior executive to oversee and designate responsibility for the recordkeeping program, as well as to ensure that policies and procedures are adopted so the program can be audited.

- To demonstrate the principle of *integrity*, an organization's recordkeeping program must ensure that its records and information are reasonably authentic and reliable.

- Complying with the principle of *protection* requires an organization to protect its private, confidential,