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LIS 886

RG/IG Program Plan Assignment

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The Assignment:

As the capstone assignment for this course, you will prepare a comprehensive program plan outlining the short- and long-term goals for a newly approved RM/IG program. This assignment will fuse all course theories and topics into a unified program plan, displaying competency in establishing and maintaining an effective RM/IG program. As with all professional RM/IG program plans, you must consider and effectively communicate to audiences concerned with balancing technology, fiscal, training, legal and compliance needs (to name just a few).

For our Day One agenda (or, if we want to be a little more realistic, our week one agenda), we want to focus on three things - we need to start creating a records retention schedule, we need to start identifying and organizing our existing records so we know how the RRS will apply to them, and we need to start distinguishing between records and nonrecords when new documents are created, otherwise the amount of information we have to deal with will be so large that organizing our existing records will be an endless process. (That we are apparently running out of not just physical storage, but disk space as well, tells us that we are keeping too much). We'll need to hire a few people or recruit some volunteers to take those banker's boxes out of the basements and start sorting through them. We'll need a space to do this in; since the Director of University Archives is interested in some documents, maybe they can help us out with some temporary space to start this project in.

Creating our records retention schedule is not reinventing the wheel - universities are all pretty similar, and as we saw in the earlier assignment many of them helpfully make their policy public, so we have a solid foundation to start creating our own document. DePaul University in Chicago, for instance, is a similar institution that provides a very granular breakdown of the retention schedule for various records:

https://offices.depaul.edu/general-counsel/services/records-management/Pages/records-retention-schedule.aspx

It is likely that 90% of these line items are exactly what we would want for our university, but the remaining 10% is crucial to get right, so if our internal legal counsel is not able to assist us

with this process in a timely manner, we need to hire an attorney with experience in this field - in fact, even if we write the policy completely on our own, we probably want an experienced legal consultant in the field to look over the RRS at some point before it becomes official policy, because this is a complex matter that involves interaction at least a dozen governmental agencies as well as the possibility of civil lawsuits. Having the records retention schedule complete, legally vetted, and officially implemented, should be our most important goal for our 60 day milestone. (Although, sixty days is fairly ambitious; If it is not complete, this shouldn't be allowed to become a blocker for any of our other goals.)

We will also want to consult with each department in the university about our RRS, of course. The outside consultant who did the initial assessment will have identified the necessary contacts within each department, hopefully, so for each section of our preliminary RRS, we can schedule an interview and go over the particulars of each relevant group of documents. Scheduling one-on-one sessions like this will be a little more time-consuming than having a group meeting, but it is likely to be more efficient in the long run. The head of each individual department should both be familiar with the compliance regulations that they need to adhere to, and able to answer questions that are specific to your institution, such as "how often do requests for this type of document come from former students?" Take note, though, that the point of these interviews is not to have each department create their own RRS policy — if everyone was managing this process successfully on their own, the RM/IG Director position would not be necessary.

The other major research project that we are going to undertake right away is looking for an online Record Management System for the university. (These are also sometimes called Enterprise Content Management systems, depending on their scope; I will using the term RMS in this paper.) The long-term goal of every IG/RM department in the 21st century is to move away

from paper records. There are dozens of software products available, but for an organization the size of a university, we need an enterprise level system that comes with support staff and consulting help. Products at this level come with a sales staff more than happy to explain how they work to you, so after creating a checklist of all of the processes that you want to be handled by your new RMS, have a couple of afternoons scheduled to talk to salespeople and go over your list of required features with them. Doing your homework is not optional here; be sure you have a list of specific requirements to present to each vendor's salesperson, and a general understanding of the market space, or you'll be wasting your time. After some initial meetings to get a feel for what is on the market, we will work with upper level management to create a formal RFP and take bids from the vendors that seem most promising. This process can end up taking longer than you might anticipate, so try to get the ball rolling as soon as possible.

You will also want to get Accounts Payable onto a modern internet-based platform; if this isn't part of your DMS system it needs to be integrated with it, so that goes on your list of questions for the vendor's sales reps. At this point, you might find yourself doing a little selling of your own; just because you know perfectly well that these systems are going to improve the performance and productivity of the university doesn't mean that each department you would like to see go paperless is going to agree with your plans. People within a large organization can be very possessive about what they perceive as their domain and can be resistant to change. How you overcome this is going to depend on your personal style and skills, but it's always preferable to have cooperation and buy-in from the other stakeholders.

Another problem you should deal with at the earliest possible convenience is the movement of documents between the loop and main campuses. Our first step is low-hanging fruit; we need to buy some decent scanner units that can automatically convert documents to PDF, and convince

the personnel at the loop campus to use these when transferring documents instead of handing them to a random student who happens to be travelling to the main campus. (Given the recent kerfuffle, hopefully this won't be hard to do.) We'll have to come up with a stopgap system for document sharing, since we don't have our enterprise DMS system in place yet; for documents like personnel records that require a moderate level of security, a Google Drive or Microsoft OneDrive account would be an acceptable solution for a month or so, as long as access to each account is limited to a few people at most so there is accountability for the documents that are stored and shared this way. Giving only a few people access to these resources will be inconvenient, but it can't possibly be less convenient than the current system of using couriers, so maybe this will be a good way to introduce some key people to the advantages of electronic document handling.

An obvious corollary to these initial steps is that for each of them, there are people we need to get involved; building relationships is something that is integral to our work, as Smallwood discusses in his general principles of information governance (Smallwood, 31). Approach department heads and key personnel as collaborators, keeping in mind that while their immediate priorities may be different from yours, the ultimate goal is to reduce burdens whenever possible and make things run smoothly. When you're asking someone to do something new, or change an established pattern, go out of your way to make sure they understand why this change is happening and what the benefits are, rather than focusing on the consequences of not doing it. Carrots work better than sticks.

Once we've got the Loop campus and the HR department up to speed on how to use scanners and cloud storage to share documents, we'll be prepared to explain the same procedures to Admissions and Financial Aid. This is a case where it would be helpful if the President would

empower you to make some rules, so that you could insist that documents be copied to the cloud and accessed there instead of physical copies being made and transferred. Offices that do a lot of clerical work and are busy all the time, like Admissions, are likely to be most resistant to changes in procedure, just due to time constraints. So if this is a situation where we need to pull weight rather than use diplomacy, so be it, but avoiding the needless duplication of paper copies of important records is one of the most basic practices of records management, affecting both document integrity and security (Smallwood, 88) as well as operational needs.

So after a couple of weeks, we should be in a position to set up some realistic goals for the 60-day milestone. Between our interviews with department personnel, and the process of cataloging the stored records, we should have an idea of what records are being created and why, at least for the most active units within the organization. Once we are confident that our RRS is fully worked out for a department, we can start the process of record disposition, both paper records and the files on those network drives that the CIO is complaining about. The new RRS will apply to emails as well; while the current 90 day deletion policy is probably fine for many email messages, there are several classes of email message that we will want to start archiving for both legal, operational and historical reasons, and once you can start deleting some files from the school's hard drives this should not be a major issue for the IT department — emails are text files and take up relatively little space. By the 60 day deadline that the CIO has set for file deletion, enough older records will hopefully have been disposed of to satisfy their demands - given the lack of disposition policy, we can assume that there are at least a few decades of old data that can now be classified properly. If there are still departments that haven't deleted their 30 gig quota, and we've carefully analyzed our RRS to make sure it is as stringent as possible about disposition dates, then we'll have to come up with a temporary solution (storing 30 gigs of data

on a cloud service is a negligible expense) while we move towards our main 120-day goal, having a fully implemented cloud-based DMS.

We'll also be destroying paper documents, and this is another area where we will probably want to work with a vendor or two. We need to come up with a permanent storage solution for the paper documents that we need to keep, and any that we generate in the future (there's always going to be a few). There are several document management companies that can handle both our shredding and long-term storage needs, and do it in a way that will also solve some of the problems of the Director of Risk Management; secure off-site storage for documents that are not currently in circulation will be a slightly more expensive solution that stuffing everything in the basement, but the piece of mind is well worth it. Moving these documents around is going to involve extra legwork and coordination from a lot of people, so it might be wise to create a part or full time position for a document logistics person who will liaison between the document management vendor and the various offices that need their services. Once we have our procedures for moving inactive records to offsite storage, the offices that are still shuffling paper around should have a low enough volume that they won't need more than a few filing cabinets to manage their workload.

While we're going through all that paper, though, let's not forget the Director of the University Archives. Our staff that catalogs these documents and handles their disposition needs to be trained to recognize when something is historically significant or interesting, and set it aside for the attention of the Archives department. They might end up sending some of these back to us, so be prepared for that and don't unnecessarily repeat your cataloging efforts because a document has gotten "lost".

So at 60 days into our project, we have a functional records retention schedule, we're managing our paperflow in a sustainable way, and we've established the rudiments of an electronic record management policy. We should have chosen a vendor for our enterprise DMS at this point; the main project for the next two months is to integrate the DMS into as many of the record-generating activities of the university as you possibly can. We'll start with the offices that we've already gotten to share their document on the cloud, such as the Loop campus; they may grumble about having to learn yet another new set of procedures so soon after making a change, so be make sure to explain that this is the shiny new toy that the university is paying a lot of money for and it will be around for a while. Assuming that we have done our job and adopted a platform that fully addresses the needs of our organization, we can be reasonably optimistic that our coworkers will immediately see the advantages of the features that come with a professional document management system, such as automatic document recognition and categorization and keyword searching. Always bear in mind that the goals of information governance are to create value as well as to prevent danger, by treating information itself as something valuable.

Moving day-to-day bookkeeping and accounting into a fully electronic system will probably be the most challenging part, because there is little room for things like experimentation and learning curves when money is involved. Depending on what vendor we went with, the financial system may be fully integrated with the enterprise DMS, or it may be a separate software service that integrates via an API. In either case, support and training from the vendor is going to be crucial for the success of this transition, so make sure that you have access to enough of both as part of your contract with them.

There's a few issues that we haven't been paying much attention to as we scramble madly to get our new systems into place; among them are compliance with privacy regulations and legal discovery requirements. No one was paying much attention to these issues before we came along, so we certainly haven't made anything worse, but meeting requirements like these are among the most important reasons that we are investing in our fancy new DMS. Sophisticated access management, so that only personnel who need access to sensitive records have access to them, and the aforementioned search capabilities, reduce the amount of human effort and the possibility of human error involved in these critical functions. Keeping the bulk of our information in cloud storage also covers our disaster management needs - if the budget permits it, we should have our long-term storage vendor begin the process of creating backups of all the inactive records in their keeping, although if they don't have the same level of thorough indexing as newer documents, that is acceptable, since the odds of one of them being searched for is small.

By day 120 of our project launch, our goal is to have our DMS be the main "source of truth" for all recordkeeping activities within the university. This is a fairly ambitious goal; we may not be 100% there by the target date. In fact, we might not ever be 100% of the way there. Paper is always going to be a part of life in a bureaucracy, and as new procedures and policies become active, decisions will be made about what is a record, and new entries will be added to the retention schedule. This brings us to our next project, after a short breather — establishing a schedule of regular audits of the recordkeeping system. Having an audit schedule is not just about looking for problems, it's also about looking for opportunities for improvement — nobody gets everything right the first time. Assurance that we are meeting legal and regulatory requirements is the most critical part of the audit process, though, and it should be built around that goal. This is an opportunity for the RM/IG Director to earn some goodwill from the other

department heads, by taking the responsibility for compliance off of their plates and adding it to yours. By the end of the first year, this audit schedule should be formalized and published, so that everyone responsible for keeping records understands what their responsibilities are. Each department will have an annual review where the RM/IG Director and a senior person in the department will review policy and make sure that operational procedures are following the stated policy, and that policy reflects the current legal requirements. If there are problems, try to understand what is causing them, and either add resources to fix them or adjust policy if it needs to be adjusted, keeping the core goals in mind.

WORKS CITED

Smallwood, R. (2020). *Information Governance: Concepts, Theories, and Best Practices.* John Wiley & Sons.