EMPLOYING THE GENERALLY ACCEPTED RECORDKEEPING PRINCIPLES:

REQUIREMENTS FOR ELECTRONIC RECORDS AND INFORMATION MANAGEMENT

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Learning Objectives

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

- ◻ Identify recordkeeping requirements derived from each of the Generally Accepted Recordkeeping Principles®

- ◻ Apply the Principles and requirements to the management of electronic records

This presentation is based, in part, on the paper:

Employing the
Generally Accepted Recordkeeping Principles®
to Identify Practices for Efficient and Compliant Electronic
Records and Information Management

Presented to the University of Oregon Interdisciplinary
Studies Program in partial fulfillment of the requirements
for the
Applied Information Management
Master of Science degree

To download the full text of this paper, please visit
http://aim.uoregon.edu/research/

Generally Accepted Recordkeeping Principles®

- Formerly GARP® , now known collectively as "The Principles"

- Published in Spring 2009

- Modeled after GAAP

- Comprehensive, yet general

Generally Accepted Recordkeeping Principles®

- Developed from:
  - Combined experiences of the development committee
  - 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

Generally Accepted Recordkeeping Principles®

- The Eight Principles:
  - Principle of Accountability
  - Principle of Integrity
  - Principle of Protection
  - Principle of Compliance
  - Principle of Availability
  - Principle of Retention
  - Principle of Disposition
  - Principle of Transparency

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

Why Requirements?

- [ ] Records and recordkeeping are essential to the operation and management of organizations

- [ ] The Principles are comprehensive in scope, but general in nature

- [ ] Provide the basic framework necessary to implement RIM programs

- [ ] Establish a common reference point for RIM practitioners, IT specialists, business leaders, etc.

Why Requirements?

- Enhance understanding by "simplifying" the language of RIM

- Synthesize extensive body of standards, best practices, and requirements in an easily "digestible" format

- Result in a customized recordkeeping solution when combined with the unique needs and circumstances of an organization

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

- Authority
  - Force/make change
  - Assign, delegate, and hold responsible
  - Obtain and distribute resources
- Documented Processes
  - Well constructed
  - Regular review with appropriate approvals when needed

Principle of Accountability

- Audits & Remediation
  - Reinforce compliance
  - Identify weaknesses and gaps
  - Establish plans to address identified issues
  - Demonstrate compliance

Principle of Integrity

"A recordkeeping program shall be constructed so the records and information generated or managed by or for the organization have a reasonable and suitable guarantee of authenticity and reliability."

Principle of Integrity

- Capture mechanisms and controls
- Protections against alteration
- Security procedures/controls
- Proper disposition
- Standardized metadata
- Maintenance and upgrades of software and hardware
- Planned and managed data and system migrations

Principle of Protection

"A recordkeeping program shall be constructed to ensure a reasonable level of protection to records and information that are private, privileged, secret or essential to business continuity."

Principle of Protection

- Know what is collected, why, how it is used, where it is stored, and what happens when it is no longer needed

- Understanding of laws and regulations

- Information security protocols

- Consistent and appropriate disposition procedures

- Business continuity and recovery planning (BC&R) and testing

Principle of Compliance

"The recordkeeping program shall be constructed to comply with applicable laws and other binding authorities, as well as the organization's policies."

Principle of Compliance

- Identification and understanding of all internal and external requirements impacting organizational records and information

- Understanding the repercussions of non-compliance

Principle of Compliance

- Compliance of supporting processes and technologies
- Audit and remediation programs to validate compliance and address gaps

Principle of Availability

"An organization shall maintain records in a manner that ensures timely, efficient, and accurate retrieval of needed information."

Principle of Availability

☐ Organizations must be knowledgeable of the records and information they create and maintain

☐ Test expectations/assumptions against reality

☐ Creation and maintenance of detailed recordkeeping system designs and supporting documentation

Principle of Availability

- Standardization of workflows at all stages of the RIM lifecycle

- Validation of workflows

- Meticulous documentation of systems, workflows, and expected outcomes

Principle of Availability

- Proper technology implementations
  - System is appropriate for the task
  - Effective controls and procedures
  - Proper configurations and integrations
  - Training of users and support teams

Principle of Retention

"An organization shall maintain its records and information for an appropriate time, taking into account legal, regulatory, fiscal, operational, and historical requirements."

Principle of Retention

- Determination of appropriate retention
- Documentation of identified retention periods
- Implementation of retention periods
- Retention compliant workflows

Principle of Retention

- Evaluation of legacy systems
  - Upgrade or replace
  - Cost and risk assessments
  - Detailed documentation of strategies, results, decisions and efforts
- Audits and remediation

Principle of Disposition

"An organization shall provide secure and appropriate disposition for records that are no longer required to be maintained by applicable laws and the organization's policies."

Principle of Disposition

- Security of records and information during the disposition process

- Appropriate methods of transport, storage and destruction

- "Logical" deletion versus actual deletion/overwriting

- Format and software considerations for historical preservation

Principle of Disposition

- Audits and remediation programs
- Identification and addressing real or potential process gaps
- Preservation/litigation holds

Principle of Transparency

"The process and activities of an organization's recordkeeping program shall be documented in an understandable manner and be available to all personnel and appropriate interested parties."

Principle of Transparency

- System design
  - Clear workflows
  - Well-defined inputs and outputs
  - Appropriate structure
- Demonstrate reasonableness, accuracy, and enforceability

Principle of Transparency

- System documentation
  - Records Management Polices
  - Defined records creation processes
  - Definitions of captured data
  - Well-understood workflows
  - Well-defined records lifecycles
  - Defined process for initiating and implementing exceptions
  - Defined and executed disposition process

An Information Governance Framework
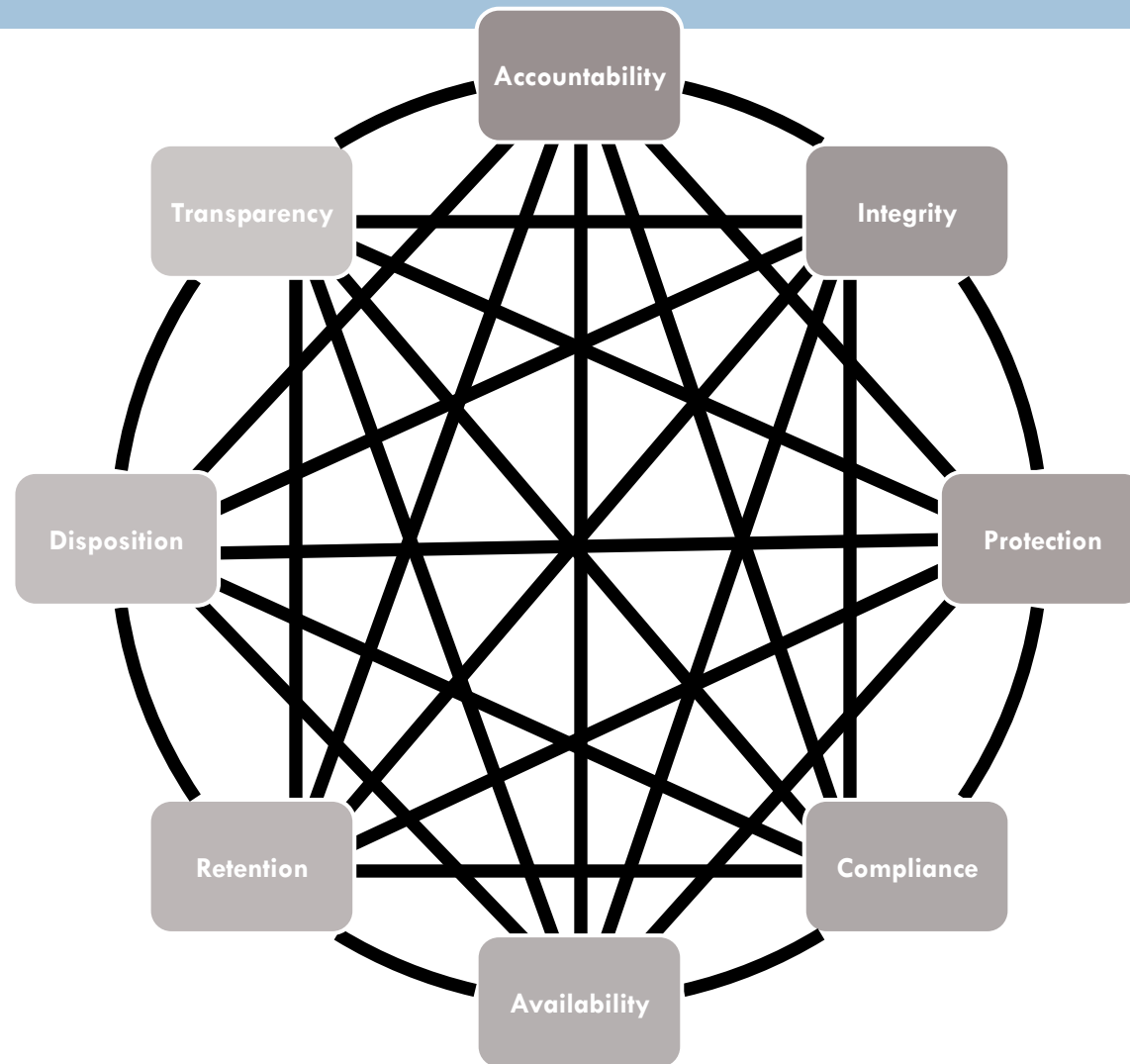
An Information Governance Framework

The Information Governance Program

Thank you!

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