

irca 1984: FedEx had just introduced a new service called ZapMail. For the low cost of only \$35 per 10 pages, it would fax your document from FedEx depot to depot, then print, package, and dispatch the document to vour office via courier. Those were the days of carbon paper, Thermo-Fax, and plain-paper copiers.

They were also the days when the only limitations to uncontrolled creation and retention of information were the technologies themselves. ZapMail was innovative and a boon to individuals who could not afford a fax machine, but it was doomed to fail by the coming juggernaut of technology development.

Circa 2013: Imagine today the U.S. Postal Service delivering paper mail at the same rate at which e-mail, tweets. and texts are received. Would the overload fill a basement, a garage, that extra bedroom? Would there be a need to buy a storage shed for the back yard?

Of course not; recipients would instead find a way to dispose of most of it quickly. Yet, somehow in the work environment, the information technology (IT) department is expected to allow users to fill all available electronic rooms not only with e-mail, but also with other obsolete, duplicative, and trivial data.

Organizations have arrived at this place honestly. Policy, training, and management did not keep pace with technology and peoples' ability to create information. Users were turned loose with cool new tools and little to no direction or forethought as to how they should be used or the problems they might create. Indeed, the impact and speed of advancement of computer technology were truly "unknown unknowns," opening the floodgates to random, prolific, and unfettered creation of information.

Accountability After the Fact

Imposing order and accountability after the fact may seem a little like closing the barn door after the horses are out. Yet it is imperative that organizations catch and corral the horses and begin to impose order in the stable. The greatest challenge may not be the volume of information or the capabilities of technology, but introducing the concept that the responsibility to fix the situation is each person's job.

Accountability must be at the heart of any organizational initiative to control and improve information governance. Without it, good intentions fall short. Further, accountability must include everyone from staff to management to stakeholders within the organization. Contrary to popular belief, information governance is not the sole responsibility of the IT function.

Move Left, Young Man

With homage to Horace Greely, organizations must seek their information governance destiny by expanding their understanding of and developing the left-most (first) element of the well-known Electronic Discovery Reference Model: information management (See Figure 1 on page 36). They do this by deconstructing and then reconstructing the situation through an ordered process of assessment, analysis, action, and audit.

1. Assessment

Assessment most often starts with a recognized problem or pain point. Examples might include a growing e-mail archive or a costly e-discovery project. The key here is not only to acknowledge the pain, but also to identify the root cause(s), much like a medical diagnosis. Typically, there is not just one symptom. A good assessment, therefore, should go beyond presenting the problem to examine and measure multiple facets of the "as is" state.

Facets might include such matters as the organization's culture; governance, risk, and compliance environment; technical structures and capabilities; workers' skills assessment: organizational structures: and data demographics. This phase might also include a review and comparison of benchmark standards, such as the Generally Accepted Recordkeeping Principles® or ISACA's COBIT 5 (a business framework for enterprise IT governance and management).

Analysis of the information gained during this fact gathering will likely point to one or more root causes of the problem. For example, a request to buy more network storage (an apparent cost problem) may be traced back to multiple root causes:

- · No control of creation of data
- No process for deleting data of former employees
- No mechanism to identify duplicate or obsolete data
- ·Little, if any, training to inform users regarding good data management practices

Once these root causes have been identified, the next step, analysis, is to deconstruct them further and begin to illuminate the changes to be made.

2. Analysis

Analysis of the root causes puts them in perspective and helps establish the desired "to be" state. This desired end state has as much to do with the goals and strategies of the organization as it does with the technical and tactical solutions.

Getting the analysis right is hard work and requires input from senior management, as well as from subject matter experts in IT, records management, compliance, human resources, and other business units. But, there is no substitute: an incomplete analysis or shortcut here will either handicap the rest of the process - or worse - lead you down the wrong path entirely.

As an example, a shortcut analysis of the above scenario might lead simply to establishing a quota on data storage, thereby relieving the pressure to buy more server space. Although this fix might temporarily limit the growth of primary storage, it eventually will lead to leakage as users find ways to circumvent the rule. So, failing to address the root causes thoroughly not only postpones the problem, but it may also create a new one in the form of rogue repositories — leading to even less control.

Unfortunately, the process of appraisal and analysis often uncovers multiple issues. A key step is to prioritize the elements of the desired end state. This prioritization will depend on many things, including available resources, the ability to find quick wins, and the organization's culture. Priorities will and should also be driven ultimately by organizational goals and strategies.

Analysis usually goes back to basics and most often involves developing structure, processes, policies, and training. Appraisal should also prepare a path and point the way to the next step: action.

3. Action

Too often, organizations jump to the action phase prematurely – the "ready, fire, aim" approach – installing an e-mail archive system or issuing policy changes before fully understanding root causes and putting them in perspective. However, if the assessment and analysis steps have been thoroughly completed, then the groundwork is laid to establish the necessary structure, direction, and resources to solve the problem.

The path to improved IG, regardless of industry, organization size, or even culture, requires some degree of structure. Structure provides the understanding of what record-worthy information exists, where it is and in what form, how long to retain it, and when to dispose of it.

The foundation of structure is a

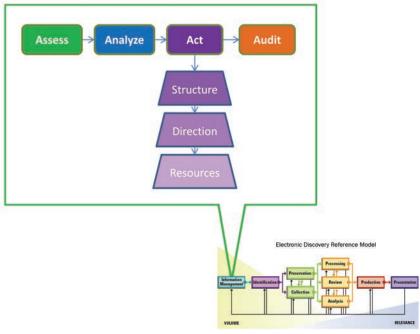


Figure 1: Information Governance Extension to Electronic Discovery Reference Model. Source: EDRM: Extension by Deborah H. Juhnke, CRM

current, legally validated records retention schedule and up-to-date file plans. A retention schedule is a high-level, functional framework for an organization's information, with retention periods based on legal requirements and business needs. File plans capture more specific types and locations of business records and business reference documents, typically on a departmental basis.

Direction is provided by policies and processes that enable employees to comply with information governance requirements. E-mail and computer-use policies, records management policies, and privacy and security policies all inform employees of what they should do. Processes, such as periodic clean-up days, tell them how they should do it.

It is here that the beginnings of the information lifecycle may be addressed, by encouraging thoughtful communications, such as when communications should be reduced to writing and when they should not, to whom they should be addressed, and in what form. Identifying the right resources is an indispensable part of making good information governance a reality. Although structure and direction provide the foundation, implementing the governance plan and ensuring compliance will require people, time, training, and, often, technology.

With the these key elements in place, organizations are well positioned to pursue concrete solutions for such actionable matters as managing e-mail and offsite paper records, organizing unstructured network storage, disposing of legacy data, and accomplishing litigation readiness and legal holds.

4. Audit

We begin and end with accountability. The buck stops at everyone's desk. Though both formal and informal audits are important compliance tools, the ultimate success of an information governance initiative will rest with individual accountability.

Workers may only be held accountable, though, if they are informed, trained, and supported.

Unless organizations offer this guidance and work to instill and support the self-discipline required to rein in the indiscriminate creation and retention of information, they will continue to struggle.

Some have said that the answer lies not in people but, rather, in technology - that people can't be trusted to monitor themselves, and that organizations should give up thinking they can rely on their employees to learn and embrace a better way. Nothing can be further from the truth.

Remember that the conditions that got them to this point consisted primarily of no direction and no guidance. Organizations can create an environment where employees work in their own self-interest - as well as that of the organization - to improve their creation, use, and disposition of information, supported as appropriate by technology.

Managing Half the Organization's Total Value

According to Symantec's "State of Information Global Results 2012" survey report, 49% of an organization's value is derived from the information it owns. It follows, then, that IG is an absolutely critical tool for business success. This is true, particularly given that this same report projected that data stores would grow in the following year by as much as 67% for enterprises and 178% for small- to medium-sized organizations.

Organizations simply must take control of their information assets. Employees can be asked to follow the rules of the information governance road, just as they must follow the traffic rules of the road, provided the rules are practicable. It's up to management to lead the way. END

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