

The Principles at Work at Ameritas: Planning a Unified Approach for Managing E-Records

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As the second vice president of corporate facilities at Ameritas, an insurance and financial services mutual holding company headquartered in Lincoln, Nebraska, Robin Martin, CBCP, FLMI, has responsibility for business continuity, purchasing, and project management of new construction underway in Cincinnati. (See Martin's career overview on the next page.)

Martin assumed leadership for records and information management (RIM) in 2011, an organizational move that made sense given her understanding and awareness of records concepts earned through her experience with Ameritas. Up to this point, the Ameritas records program had been mostly focused on paper records, with an in-house

records storage facility and a Lotus Notes database to manage storage and retrieval of boxes. Retention schedules had also been developed, but actual disposition of outdated records was primarily of hard copy records.

Around this time, the company realized it needed to apply records principles to focus on disposition of electronic, as well as paper records. Soon the discussion turned to where responsibility for electronic records should reside, and while a case could be made for management by information technology (IT), it was ultimately decided that the data and records belonged to the various business areas. It was determined that a unified, strategic approach was needed when it came to electronic

records, and Martin was tasked with overseeing this.

Getting Started

As an initial step, Ameritas engaged Huron Consulting to assess its records and information management program based on the Generally Accepted Recordkeeping Principles® (Principles) and the Information Governance Maturity Model (Maturity Model). Huron determined that pre-existing RIM efforts had many elements of the Principles in place, although they had not necessarily been identified or categorized as such. Using the Maturity Model, Huron was able to determine objectively where various RIM aspects were adequate and address areas that the company might want to consider for

enhancement or improvement.

“One of Ameritas’ requests was that assessment results be conveyed as descriptive findings rather than as numeric ratings,” says Martin. “There was concern that if we got a numerical score, what would it mean and how would others interpret it? More description was necessary, rather than numbers, and we were able to do this with the definitions that the tool provides. We were also able to explain what the various levels – Sub-standard, In Development, Essential, Proactive, and Transformational – meant when we presented the assessment results to the steering team.”

From the assessment, Huron developed a five-year plan, defining activities aimed at improving or enhancing various program elements that would strengthen the program and position Ameritas for effective management of electronic records.

Establishing Accountability

“For [the Principle of] Accountability, for example, Ameritas did not previously have a corporate records officer in place,” said Martin. “This was addressed with a formal infrastructure that now includes a steering team comprised of legal, IT and RIM. In addition, all departments have department records administrators, usually people at management level who are ultimately accountable and responsible for RIM.

“There are also records coordinators, the doers who make sure that work gets done, that training takes place, and that retention schedules are reviewed and refreshed on a regular basis,” she said. Large departments in bigger lines of business may also have departmental records representatives.

Enhancing Retention

To enhance the Principle of

Robin Martin: A Career Overview



Martin is the Second Vice-President of Corporate Facilities at Ameritas, an insurance and financial services mutual holding company headquartered in Lincoln, Nebraska, that serves approximately 3.2 million policy holder/members. Its 2,300 associates nationwide offer life insurance, annuities, individual disability income insurance, group dental, vision and hearing insurance, as well as retirement plans, investments, mutual funds, asset management, and public finance.

Martin has held this post for seven of her 25 years with the company, which includes responsibility for business continuity, purchasing, and project management of new construction underway in Cincinnati. She assumed leadership for records and information management in 2011.

Martin is a Certified Business Continuity Professional and a Fellow of the Life Management Institute (*a life insurance industry accreditation*).

Retention and prepare for applying retention periods to electronic records, retention schedules were consolidated across all lines of business and their regulatory requirements reviewed in 2011.

“Even though we thought we had a process-based schedule, it was really departmental. Different lines of business had different requirements. We were able to streamline when we realized that the process is insurance, for example, and that a policy is a policy. This also helped to eliminate duplicates and get consensus on retention,” noted Martin.

Another change was to the retention periods themselves. “The previous schedule had event-based codes,” Martin said. Event-based retention codes rely on the occurrence of an event to start the retention clock ticking – things like close of a project or termination of a contract. “When we went through the schedule review, we knew it would be difficult, if not impossible, to apply event-based codes to electronic records, particularly in structured systems like databases. So we worked with tax [personnel]

and others to come up with finite, numerical retention times – for example, a specific number of years – which we could more easily apply in both the paper and electronic realms.”

Improving Compliance

To improve on the Principle of Compliance, Ameritas reviewed regulatory changes within the insurance and financial services industries. Martin also reviewed existing RIM policies. She noted, “Most of our RIM policies were broad enough to cover all records, not just physical, and with a few tweaks in this area we were able to strengthen them.”

Focusing On E-Records Systems

With revised retention schedules in place, Ameritas is focusing on systems that contain structured electronic records, namely databases for such functions as policy administration.

“What we are currently doing,” said Martin, “is identifying whether these systems have retention capabilities as part of their

operating systems, and if so, how they can be utilized, and if not, how such capabilities can be added.”

Martin continued, “We started with a pilot project of five systems to get our feet wet. Of those five systems, three required remediation, one didn’t contain records, and one needed a retention schedule modification. Since then, we’ve done an inventory of all systems and have asked records administrators and coordinators to help identify which of these contain records.”

Martin said many questions are emerging during this process,

The past has shown that because Ameritas is a diversified company with various lines of business, some decisions have been made in silos. “What the advisory team is striving for is an organization-wide perspective. There is a need to understand that what one part of the business does can affect other lines as well. If we buy a new system, we must address privacy, security, protection, and record-keeping up front,” said Martin. “We want to make sure we are in compliance with laws and regulations, of course, but also with our own retention schedule and policies.”

easier for everyone to understand and use, and easier to maintain.”

Martin added, “Today people ask the question [about retention] where they previously didn’t know that a question existed or what the question was.”

Looking Toward the Future

One issue familiar to all records managers is the scarcity of resources. Martin notes that RIM is not any one person’s full time job in any department. Her own resources are limited to the manager of the imaging function, who is responsible for maintaining the

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beyond those about the availability of retention capabilities, including, “What is a record, what is metadata? What types of records does this system contain, what risks are associated with them? Do we get legal holds on the system? Is it as simple as plugging in retention requirements? How can retention and purge aspects be effected in the system?”

Moving Toward Information Governance

It is a large undertaking, and one that raises questions even beyond records management. Earlier this year, Ameritas formed the Information and Records Governance Advisory Team to discuss questions regarding privacy, protection, and retention of information throughout its life cycle. The advisory team is composed of leaders at the executive level who are in a position to know what is planned for electronic systems within their areas of responsibility. Martin believes the Principles can help this team’s efforts by giving everyone a consistent understanding of what good information governance requires.

Recognizing Benefits

Martin is beginning to see changes. “Now if a business area looks at a new system, they are able to ask the right questions. From our work on structured systems and information governance, we can fine tune the list of requirements that the system must fulfill. More than just checking ‘yes’ on a list of generic requirements, we can determine if the system under consideration does recordkeeping as Ameritas specifically defines it. These are standards that are starting to develop and will continue in the future.”

Another benefit of Martin’s work is a heightened awareness of RIM company-wide. Ameritas has developed online RIM presentations that are mandatory for all employees as part of the new hire onboarding process.

“Everyone has records,” said Martin, “and we need to make sure they are educated. Associates can go through the module to understand what is meant by ‘records’ and ‘records management.’ Ameritas’ streamlined and consolidated retention schedules have become

retention schedule; a paralegal in the law department, who provides legal hold and RIM management assistance; and one person who oversees the records storage center.

Despite these limitations, Martin said, “We have learned that we need to be flexible. We may want to accomplish x, y and z, but we may only be able to do x.”

Thanks to the Maturity Model, the RIM program can prioritize and concentrate its limited resources on what is most important to the overall goal.

Although Ameritas has not yet determined whether it will do another RIM assessment, Martin believes the program will keep working, possibly with a three-year planning horizon focused on electronic records.

Martin concluded, “We know we don’t legally need to be a [Maturity Model] Level 5 in everything, but if we can get to a certain level, that’s great, and we can build from there.” **END**

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