## Question:

**My organization has kept every document (and version) it has ever produced. We will be moving soon and need to reduce quickly the amount of documents we currently have. Do you have any guidelines we could easily follow to get us started?**

## Answer:

Start building a relationship with legal counsel as a first step toward developing a retention schedule and planning your strategy for retaining or disposing of materials in preparation for the move.

### Make High-Level Decisions

Counsel can help you identify areas of risk for litigation you need to pay special attention to, which will help you determine what you should keep or destroy. Consult with counsel to consider some high-level strategies for reducing the volume of information; these might include:

- Disposing of document drafts when there is a final version
- Destroying the paper version of records for which there are identical electronic duplicates
- Determining a cut-off date before which it **may** be permissible to destroy some records. This depends greatly upon the age of the records, the industry you are in, and the types of litigation/government investigation you are involved in. Proceed carefully with legal counsel by your side!

### Learn Record Retention Concepts

You may not have time to develop a retention schedule before the move, but reading the book *How to Develop a Retention Schedule* (available at *https://www.arma.org/store/ViewProduct.aspx?id=10505763*) could be useful in helping you plan your initial strategy for dealing with documents and for securing counsel's agreement for your go forward strategy. *Information Management* magazine (available at *imm.explorearma.org*) is also a good educational resource.

### Inventory Records

Meet with each department or business unit to conduct a high-level inventory to:

- Document what kinds of information each has (e.g., employee evaluation forms, payroll information).
- Determine how department staff use their information (e.g., frequently reference, occasionally use)
- Identify the types of information needed most frequently, which

## Records Inventory Form

| | | |
|---|---|---|
| Office or Department | Location/Building | Date |
| Street Address ____________________<br>City ____________ State _____<br>Country ___________ Zip/Postal Code __________ | Contact Person | Telephone No. / E-mail Address |

| | |
|---|---|
| Title of Record | What Department Calls Record |
| Description of Record | |
| Location of Record | |
| Purpose of Record | Is Record Still Created?<br>☐ Yes ☐ No ☐ Unknown |
| Type of Record<br>Original – Location of Duplicates ____________________<br>Duplicate – Location of Original ____________________ | Is Record Imaged?<br>☐ Yes ☐ No |

Record Format
☐ Letter ☐ Plans/Drawings ☐ Printout ☐ Magnetic Media (indicate type) _________ ☐ Form # _________
☐ Legal ☐ Video/Audio Tape ☐ Microfilm ☐ Publication/Books ☐ Binder
☐ Other ____________________

Filing Method
☐ Alphabetic ☐ Numeric ☐ Chronologic ☐ Subject ☐ Alphanumeric
☐ Geographic ☐ Calendar Year ☐ Fiscal Year ☐ Other ____________________

| | | | |
|---|---|---|---|
| Record Characteristics<br>☐ Vital ☐ Confidential ☐ Restricted ☐ Important ☐ Useful | | | Type of Equipment<br>Use code - see back |
| Range of Records<br>(e.g. 1/1/98 – 6/30/01, Li – Ru, 200 – 550)<br>_________ through _________ | Does Record Have Historical/Archival Value?<br>☐ Yes ☐ No ☐ Unknown | Volume of Records<br>_____ Filing Inches<br>_____ Cubic Feet | Accumulation Per Yr.<br>_____ Filing Inches<br>_____ Cubic Feet |
| Reference Rate times<br>☐ Daily ☐ Weekly ☐ Monthly ☐ Yearly ☐ Other | | Federal Funds?<br>☐ Yes ☐ No | External Audit Required?<br>☐ Yes ☐ No |

File Break/Cutoff
☐ Month ☐ Calendar Year ☐ Fiscal Year ☐ Academic Year ☐ Other ____________________

Department or Office Recommendations (Check all that apply)
☐ Destroy immediately after cutoff.
☐ Destroy _____ month(s) or _____ year(s) after cutoff.
☐ Hold in active file area _____ month(s) or _____ year(s).
☐ Transfer to ______________ department after _____ month(s) or _____ year(s).
☐ Transfer to Records Center after _____ year(s).
☐ Transfer to Archives for permanent retention.
☐ Microfilm for permanent retention after _____ month(s) or _____ year(s).

Justification for Department or Office Recommendations

Note: Attach Sample Copy of Record/Form

should be kept close at hand

- Determine what can be destroyed as non-records (see explanation of non-records below)

Feel free to adapt and use the "Records Inventory Form" on the next page for this activity.

### Dispose of Non-Records

Dispose of non-record information. Keep in mind that a *record* is "Any recorded information, regardless of medium or characteristics, made or received and retained by an organization in pursuance of legal obligations or in the transaction of business." Records need to be retained for as long as they are needed to conduct business, meet legal and regulatory requirements, and preserve organizational history you want to keep. Examples of non-records, then, include:

- Duplicate or multiple photocopies, including those created for reference or convenience
- Magazines and newspapers
- Event or meeting notices
- Reference material such as books, pamphlets, circulars, newsletters, brochures, directories
- Vendor and supply catalogs, advertisements, and promotional materials

### Store Remaining Information

As a stop gap measure, set up a storage arrangement and send to it everything that is not needed with some frequency for day-to-day business to it. Be sure to label the boxes accurately so you can properly apply the retention schedule when it is formalized.

### Develop and Apply a Retention Schedule

Begin working on a retention schedule and implement a retention program as soon as you can. This project should have high priority so that any records in temporary storage are dealt with promptly.

Once the retention schedule is in place, begin systematically reviewing stored records until you are sure you are keeping only what your organization needs for its business, legal, and historical purposes and that they are boxed appropriately to facilitate ease of retrieval when needed.

### Document Your Actions

Above all, you must "document, document, document" what your organization does regarding the retention or disposition of its information and the rationale for taking those actions. This is imperative for you from a legal standpoint and as a foundation for developing and implementing a retention schedule as you go forward

*Diane K. Carlisle, IGP, CRM*

## Question:

**A virtual employee who works from home asked if records stored with our commercial records storage vendor could be delivered directly to her home. Is there any reason we should not do this?**

## Answer:

Commercial records centers (CRC) generally will not deliver to residential addresses, primarily because of concerns about their own insurance coverage. For example, what happens if the CRC's employee slips on ice and is injured? But, even if your CRC is willing to do so, it's not a good idea for the organization to allow it for the primary reasons listed below.

### Security Issues

An organization cannot be assured of adequate security for any sensitive information in the boxes once they are delivered to an employee's residence. These records could be exposed to visitors to the home – none of whom have signed (or could be legally bound to sign) a non-disclosure agreement.

The company also could lose oversight over the information. As difficult as it is to get employees to return charged out boxes to the organization's onsite records center, how difficult would it be to get back boxes located in employees' homes?

### Regulatory Issues

Another concern would be regulatory, particularly as it relates to certain types of financial and personal information. For example, the Payment Card Industry Data Security Standard (also known as the PCI-DSS) asks very specific questions about how payment card information is protected, including where it resides and how it is secured. It would be difficult, if not impossible, to perform physical security audits on every remote worker's residence to ensure that sensitive information is protected adequately.

### Insurance Issues

Over and above the CRC's concerns mentioned above about their insurance corage at a private residence, your own organization's insurers may not provide coverage for loss of or damage to your organization's information that is located outside its own or its CRC's facilities. What happens if your employee's home burns or basement floods, destroying or damaging boxes of your organization's records?

### The Bottom Line

This employee's request underscores not only the perils of losing control of organizational records, but also the importance of having well-defined expectations and documented policies relating to remote workers.

*Patrick J. Cunningham, CISM, FAI*