



The Western RIM

Newsletter of the Wyoming Chapter of ARMA International
<http://www.armawyoming.org>



January 2010

Pres Talk



Happy New Year to everyone....

I hope everyone's Christmas was full of love filled memories of the season. We were blessed to share our Christmas with the kids and of course the critters. Our weather certainly seemed cold enough to chill Santa on his rounds and out to our place the 'horizontal snow' has left us with some incredible 15 foot drifts (and some higher). It's good to know the days are now becoming longer and the promise of spring's warming days are just that much closer.

I don't know about everyone else, 2009 seemed to zoom by way too fast and 2010 promises to be another great year for our Chapter and ARMA International. We have a great line up of activities and events that are sure to enrich your knowledge and to help you to be more effective in your job.

This month for our General Meeting, we will visit the Echo Star facility just east of Cheyenne where we will learn more about their records and satellite systems that broadcast so much of the television available today.

Please be sure to contact Wendy to RSVP if you would like to attend the Echo Star visit. Please see more information in Donna's e-mail to all members or Page 2 in this issue.

In March we will host our Annual Spring Seminar, featuring Patrick Cunningham, a nationally acclaimed speaker.

Mr. Cunningham will speak about "Computing in the Cloud," "Messaging," "Social Networking," and other important issues facing our organizations with more and more digital-electronic communications. Look for our new Seminar Post Card and Brochure with additional information coming out this month. During our Spring Seminar we will again hold a great Silent Auction where all funds received go towards college scholarships. If you know of someone who would be interested in one of our Chapter Scholarships, please have them check with Barb Thomasee-education chairperson, at 307-777-4494, check our Website, or check with someone with their school financial office (Wyoming H.S. or Wyoming College).

Plans are now being completed for a follow-up of last fall's Disaster Preparedness Workshop.

A Panel Workshop is planned for the first of April, for our Records Management Month celebration. This workshop will address actual disasters and how they affected real businesses and people close to us. Panel speakers will discuss how their organizations faced (and dealt) with actual disasters in areas

around the Rocky Mountain region. There's a lot to share here as well as learn from each of the panelists, and their experiences.

Trevor Mitchell, who we have worked with on a regular basis in ARMA Headquarters Member Services, will be leaving ARMA International in January. He has received a great opportunity with another company and will be relocating in the Denver area. His last day with ARMA headquarters will be Friday, January 15, 2010. While Trevor will be sorely missed, we are very happy for him and I'm sure you'll join me in wishing him nothing but the greatest success! Trevor has done a wonderful job in assisting our chapter and region relations and resources and has been a fantastic asset to ARMA.

I just received official notification that **Paula Sutton** and **Sheila Issacson** have earned their **CRM's !!!!!** Our Heartiest Congratulations to Paula and Sheila! **Wahoo!**

Please give me a call if I can be of any assistance (at the Archives at 777-8907).

I look forward to hearing from each of you and seeing you at our chapter meetings and RIM activities this year.

Here's to a busy and fantastic 2010 ~ !

Pat

Board of Directors

- President**
Pat Newbern
- Vice-President**
Vacant
- Treasurer**
Donna Crock / Diane Nyffler
- Secretary**
Debbie Leonard
- Programs / Public Relations**
Wendy Kinkade
- Education**
Barbara Thomasee
- Membership**
Tim Tyler
- Newsletter**
Mary Bausserman
- Member at Large**
Rich Wilson
- Chairperson of the Board / Webmaster**
Donna Crock

Inside this issue:

<i>Upcoming January Meeting</i>	2
<i>Scholarship Fundraiser</i>	3
<i>Congratulations</i>	4
<i>"Taking Out the E-Trash"</i>	5
<i>CRM Exam Questions</i>	8



Upcoming Chapter Meeting

ECHO STAR TOUR

January 12, 2009



The tour will start promptly at 1:00 pm and will last approximately 1 -1 ½ hours [please arrive about 10-minutes early]. Lunch is on your own prior to arriving at Echo Star.

Please **RSVP** to Wendy Kinkade no later than January 4, 2010 at 307-637-6346 or wkinkade@cheyennecity.org and **provide Wendy with the following information:**

- Ü **Full name**
- Ü **Name of employer**
- Ü **If you will be driving your own vehicle or carpooling**

The following guidelines must be followed during the visit to the Echo Star broadcast center:

- + No recording capability devices (i.e. cameras, camera cell phones, audio recording equipment, etc.)
- + No food or beverages

Wear comfortable shoes (this is a walking tour) and bring a jacket as the tour may take you outside for a short time period.

Please be advised that you may be touring monitoring areas where adult material may be visible. If you would like to refrain from attending this area of the tour, please let Wendy know.

SECURITY: Please be aware that security cameras are placed throughout the building. You will be escorted the entire time you are on site. Your personal items are subject to search upon entering and exiting the building.

Plan on enjoying the tour!

Scholarship Fundraiser



Silent Auction

Scholarship Fundraiser

The Chapter's sixth Silent Auction will be held in conjunction with the Chapter's annual seminar on March 9, 2010. Last year we had over fifty items and raised over \$1,500.00 which allowed us to award three \$500.00 scholarships. The Silent Auction is a fund-raiser for the Chapter's Scholarship Fund that was established for the purposes of financial assistance to the recipient toward the records and information management profession. Funds are raised during the chapter's annual seminar by means of a silent auction.

Once again we are asking our members to gather donated items to be auctioned off. We ask that each member obtain at least one item for the auction. If each member takes a moment to gather (or make) just one item, we'd have over 30 items in our auction. I can tell you from previous year's experiences that the auctions can be really exciting as attendees try to get the last bid in on their favorite item. Some ideas of donated items include lodging, dinner certificates, blankets, gift baskets, jewelry, tanning appointments, ceramics, books, pictures, artwork, wreaths, pen sets, massages, tote bags, caps, sweat-shirts, etc.



You can mail your item or drop it off at the Wyoming Public Service Commission to the attention of Donna Crock at: 2515 Warren Avenue, Suite 300, Cheyenne, WY 82002 or contact one of the board members to make other arrangements. Please have items in by March 5, 2010.

The form describing the auction to distribute to donors as well as the Auction Inventory sheet file will be e-mailed to all members. Please complete one sheet for each item being donated. We will also have a supply of the forms at the seminar.

Thank you in advance for your support of the scholarship fund. Let's all do our part to help out individuals who are interested in records and information management. Please don't hesitate to e-mail or call me with any questions you might have. We hope to see all of you at the next chapter meeting and at the seminar.

Donna Crock, President
Wyoming Chapter of ARMA
dcrock@state.wy.us
307-777-5751

Congratulations!!!

Congratulations and a round of applause to Sheila Isaacson and Paula Sutton who have just recently earned their CRM!

Sheila Isaacson is the Region Manager for the Midwest-Rocky Mountain Region of ARMA International and a member of the ARMA Twin Cities Chapter. Her professional experience includes seven years with the Minneapolis Police Department where she managed the Criminal History and Records, Property and Evidence, and Transcription Units. Sheila is currently the Records and Information Security Manager for Syngenta Seeds, Inc.



Paula Sutton is the Records Manager for Platte River Power Authority in Fort Collins, Colorado. She has been an ARMA member for 11 years and is affiliated with the Midwest/Rocky Mountain Region and Northern Colorado Chapter where she has served as Chapter President, Vice President, Past President, Chapter Board Member-at-Large, Chapter Seminar Committee Chair, Seminar Committee Member, Newsletter, Elections and Awards Committee. Paula is currently a candidate for ARMA International Board of Directors.



ARMA International Publication

Taking Out the E-Trash

Is your organization storing electronic records and information with expired retention periods indefinitely because it lacks a sustainable policy and process for getting rid of it? If “yes,” this article can assist in your efforts to develop a sustainable policy and process by shining a light on what other organizations are doing to comply with recordkeeping requirements, decrease storage requirements, and reduce litigation risk when destroying records whose business and legal requirements for retention have been satisfied.

Susan Cisco, Ph.D., CRM, FAI, and Brad Teed

Most organizations have an established process for destroying expired physical records, but they keep electronic records indefinitely because stakeholders cannot agree on how to extend the process to expired electronic records. A 600-employee county government agency has been stalemated for months on a destruction policy, “... our IT administrators, particularly for SharePoint, want to build automatic deletion into the system, according to our approved retention schedule. Our Attorneys say, ‘NO!’ We still have to print destruction lists, get signatures, and maintain as a permanent file, just as we do with hard copy records.”

Respondents to the “2009 Cohasset ARMA International Electronic Records Management Survey” confirmed that with regard to electronic records destruction, there is considerable divergence. Approximately one-third (36%) of respondents reported having formal procedures for destruction of electronic records, half of which rou-

tinely issue and retain certificates of destruction. The remainder of the respondents (64%) did not have formal procedures or did not know if/how electronic record destruction is managed.

The purpose of this article is to analyze pertinent legal and regulatory requirements and industry standards for guidance on what constitutes legal destruction of electronic records (this article is limited to a discussion of the records that an organization legally recognizes as establishing some fact or decision or as evidence of a business transaction). Then the article will identify elements of an electronic records destruction policy and process that organizations can leverage to improve compliance with standards, laws, and regulations and reduce litigation risk when they destroy outdated and useless records.

Legal and Regulatory Requirements for the Destruction of Electronic Records

The National Archives and Records Administration (NARA) requires all U.S. federal agency electronic records, including e-mail messages, be destroyed in accordance with an approved records disposition schedule (2 CFR Part 2600, Subchapter B, Part 1234.34). Additionally, electronic records scheduled for destruction must be disposed of in a manner that ensures protection of any sensitive, proprietary, or national security information. NARA does not require certificates of the destruction for federal agency electronic records.

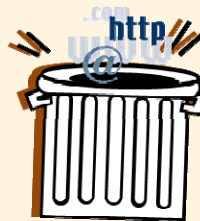
For organizations in the private sector, destruction practices for protected information about an identifiable individual employee,

customer, or supplier are regulated. Examples of protected information include Social Insurance/Security number; account number, credit, or debit card, in combination with any required security code, access code, or password that would permit access to an individual’s financial account; driver’s license or state identification card number; consumer credit reports, and personal medical information. In the United States, federal legislation such as the Health Insurance Portability and Accountability Act (HIPAA) and the Fair and Accurate Credit Transactions Act (FACTA) requires destruction or deletion of electronic files or media so the information cannot be read or reconstructed. Organizations must implement reasonable safeguards in connection with the disposal of protected information; however, neither HIPAA nor FACTA mandate specific disposal methods.

At the U.S. state level, more than 40 state governments have adopted privacy protection legislation that potentially impacts private sector organizations. Colorado, for example, has a law requiring the establishment of policies for safe destruction of documents containing Social Security numbers.

Rule 37 of the Federal Rules of Civil Procedure (FRCP) states that, “Absent exceptional circumstances, a court may not impose sanctions under these rules on a party for failing to provide electronically stored information lost as a result of the routine, good-faith operation of an electronic information system.” This safe harbor is a compelling reason for organizations to include a well-documented policy for electronic record destruction in their records and information management (RIM) programs.

International requirements such as Canada’s Federal Personal In-



formation Protection and Electronic Documents Act (PIPEDA) and the European Union (EU) Data Protection Directive 95/46 EC also address destruction of personal information. The EU directive, for example, requires personal information be rendered anonymous and retained in a form in which identification of the data subject is no longer possible when the data's purpose has been served. For organizations that must comply with EU requirements and countries with similar privacy legislation, the indefinite retention of personal information is considered excessive in terms of data protection requirements.

Industry Standards and the Destruction of Electronic Records

Compliance with the legal and regulatory requirements above can be achieved by establishing a consistent process with reasonable safeguards and destruction governance appropriate to the information's level of sensitivity and/or security classification. Industry standards provide guidance on developing such a process.

The international standard *ISO15489-1: 2001 Information and Documentation – Records Management – Part 1: General* was developed by an international committee of records management professionals and launched by ARMA International. It states that records systems should be capable of facilitating and implementing decisions on the disposition, including destruction, of records and, where appropriate, for disposition to be activated automatically.

All copies of records in all media and formats that are authorized for destruction should be destroyed and an auditable record of disposition action maintained. Records pertaining to pending or actual litigation or investigation should not be destroyed. Certificates of destruction are recom-

mended for destruction undertaken by third parties. (In physical records management, certificates of destruction usually include the date, time, location, method of destruction, and signature of the operator.)

The Model Requirements for the Management of Electronic Records (MoReq) specification was developed by a UK-based team based entirely on international standards and best practices. The most recent version, MoReq2, defines a standard specification of requirements for electronic records management offerings. It states that in some environments, retention schedules are used to govern disposition without a review. In others, schedules trigger a review of the specified disposition action, including destruction, on a group of records that has reached the date or event specified in the schedule.

In some environments it is desirable to retain information about records which have been destroyed, and MoReq2 requires that the electronic records management system has the ability to retain a "metadata stub" for this purpose. MoReq defines "metadata stub" as, "The subset of the metadata for an item that is retained after the item has been disposed of, to act as evidence that the item used to be held and has been properly disposed of."

Establishing Governance for the Destruction of Electronic Records

Next, this article will identify elements of an electronic records destruction policy and process that are helping organizations improve compliance with standards, laws, and regulations, decrease storage requirements, and reduce litigation risk when they destroy outdated and useless records. Coupled with evidence that the policy and process are routinely followed, an organization can better demon-

strate when necessary that the destruction of records was in good faith. Although not necessarily protected by laws and regulations, destruction of an organization's proprietary records, such as intellectual property and confidential financial information, also needs to be managed consistently.

Based on the authors' experience with organizations that are establishing/have established a policy and process for electronic records destruction, eight elements surfaced repeatedly across organizations and industries:

1. Governance Covers All Records and Record Formats

The governance process, including destruction, covers all records and record formats, physical and electronic. Although not addressed in this article, the process for physical records destruction needs to be consistent with the approach for electronic records.

2. Records Retention Schedule

An up-to-date approved records retention schedule covers all jurisdictions, United States and international. A records retention schedule is a formal business policy that lists the types of records an organization creates and acquires and how long they should be retained. Experts recommend updating the schedule every 18 to 24 months, especially in highly regulated industries.

3. Retention Hold Process

— A standardized process for applying and removing retention holds suspends the records retention schedule in the event of current or anticipated litigation, governmental proceedings, investigations, or audits.

4. Automated Records Destruction Process

— A standardized process for electronic records destruction is automated when possible and sustainable. When an electronic record satisfies its retention period per the organiza-

tion's approved records retention schedule, it is expected to be destroyed immediately. When the destruction of electronically stored records cannot be automated, manual processes are designed so records are deleted at the end of their retention periods.

Whether automated or manual, record destruction includes all preceding versions of records. The process needs to ensure the records, and the media that support them, are destroyed in a manner that prevents their reconstruction. Some organizations require complete, irrevocable destruction of certain types of records (sometimes called forensic deletion), which generally takes longer and costs more.

5. Destruction Logs — To reduce litigation risk, legal departments need a defensible position to support the automatic deletion of electronic records based on standardized processes for record destruction and retention holds. Destruction logs provide evidence and verify completion of electronic record destruction. Keep information on the destruction log to a minimum, starting with the unique identification of a record (number, filename, or record title).

Additional information to capture on the destruction log includes the significant dates of the record's lifecycle, e.g., creation and destruction dates and system-generated information and properties (creation date, destruction date, and the system that destroyed it). The importance of the destruction log is to prove a specific record was destroyed and provide evidence in the case of an investigation. Destruction logs are considered to have record value to be managed in the records retention schedule.

6. Third Party Destruction — When third parties are contracted to destroy electronic or physical records, certificates of destruction are recommended and usually in-

clude the date, time, location, method of destruction, and signature of the operator who destroyed the records. Certificates of destruction in physical records management are the equivalents of destruction logs in electronic records management.

7. Training — Train users and information owners on destruction protocols. Training needs to be implemented for new hires and for all employees as part of regular compliance-training activities.

8. Compliance — Monitor for compliance in ways that are non-disruptive to business activities and transparent to users.

One example is, "Key electronic records repositories will be sampled throughout the year. The objective of the sample is to confirm the complete and accurate destruction of electronic records through secure overwriting or actual media destruction. In addition, the records due for destruction per the records retention schedule and the current listing of retention holds will be audited against the records actually destroyed. The audit task will be performed annually within 30 days of the scheduled destruction date. Where areas of non-compliance are discovered, the organization will take action to address them and bring them into compliance."

What About Non-Records?

Although not discussed in this article, recorded information that does not have record value, such as convenience copies of official records, most drafts, and vendor catalogs, needs to be managed for retention purposes, as well. Using information lifecycle states, organizations can consistently apply retention depending on its lifecycle stage. A common information lifecycle model for electronic records has three lifecycle stages: 1) temporary, 2) work-in-progress, and 3) record. Information in the temporary and work-in-progress life-

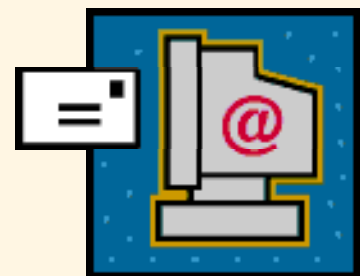
cycle stages might be managed in SharePoint (for example), and the records would be maintained in an electronic record repository, which might be in SharePoint and might be in another repository of record.

Summary

Organizations need to establish a systematic approach to the management of all records and information, including a consistent and scalable process for destroying records in all formats and media in accordance with an approved records retention schedule. The process must demonstrate the uniform application of RIM policies and processes, including adherence to confidentiality and security requirements and recognition of records on legal, tax, or audit holds. Going forward, destruction requirements need to be part of an organization's systems development and implementation methodology.

Susan Cisco, Ph.D., CRM, FAI, can be contacted at susan.cisco@gimml.com.

Brad Teed can be contacted at brad.teed@gimml.com.



Preparing for the CRM Examination - A Handbook

Institute of Certified Records Managers

October 2007

Section 3 - Sample Examination

Part 1
MANAGEMENT PRINCIPLES AND
THE RECORDS MANAGEMENT PROGRAM

1. The management concept that integrates strategic planning, total management, setting of objectives, individual motivation, measurement of results, and time is:
 - a. management by authority.
 - b. management by expertise.
 - c. quality management.
 - d. management by walking around.
 - e. management by objectives.

2. Productivity is best described as:
 - a. the amount of hours applied to a task.
 - b. the amount of time required to complete a cycle.
 - c. a measure of quantity of a resource used per unit of quality output.
 - d. a method to control standards.
 - e. the amount of energy it takes to complete a task.

3. Which of the following is not on a job description?
 - a. supervisor's name
 - b. educational requirements
 - c. skills required
 - d. age
 - e. work location

Answer Key: 1) e 2) c 3) d

Newsletter of the Wyoming Chapter of ARMA International
<http://www.armawyoming.org>



*CONTRIBUTIONS OR GIFTS TO
ARMA ARE NOT DEDUCTIBLE AS
CHARITABLE CONTRIBUTIONS FOR
FEDERAL INCOME TAX PURPOSES.*

Websites of interest:

For weather information:
<http://www.weather.com>

For Wyoming Road Information:
<http://www.wyoroad.info/index.html>

For Wyoming Facts of Interest:
http://wyoming.gov/state/wyoming_news/general/general.asp

To check out other ARMA Chapters:
<http://arma.org/chapters/index.cfm>

Wyoming Chapter of ARMA International
PO Box 474
Cheyenne, WY 82003