Developing a Document Storage Strategy

Vision Statement

- Digital image of a paper document is equivalent to the original paper document for all legal, regulatory and business purposes

Tenants of an Effective Strategy

- Work with your neighbor
- Take 15 minutes
- Develop 5 Tenants of an Effective Strategy

Goals and Objectives

- Capture images at earliest practical point
- Destroy scanned paper documents at point of capture
- Create and retain only one copy
- Destroy all documents according to policy
- Streamline document access for business functions
- Manage to minimize risk

Today's Situation

- Still paper intensive

- Multiple copies retained – electronic and paper

- Over 4M records stored off-site

- Destruction exceptions year-over-year

- Paper that has been imaged – sent off-site

Roles & Responsibilities

- Governance organization – oversight and direction

- Records Management Department – owns the Strategy, standards and requirements for compliance

- Records Owners – own the risk, manage records in accordance with Strategy

- Technology Infrastructure Groups – common infrastructure and standards

- Imaging Service Centers – review the business cases for conversion, improve processes, costs and customer experiences

Roles & Responsibilities

- Legal – Monitor regulations and case law, review exception list

- Line of Business Compliance – work with records coordinators and legal to assure compliance with the Strategy, define gaps, how to remediate

Go Forward Strategy

- Inventory reduction
    - Initiate controls to improve metadata quality
    - Cleaning up metadata w/exception reporting
    - Escalation of non-compliance with metadata standards to senior managers
    - Eliminating non-preferred vendors

Go Forward Strategy

- Revise Destruction Eligibility Review Process
    - Improve timeliness of destruction and reduce over retention of records
    - Remove destruction "exceptions" except for Legal Hold and Metadata changes
    - "Need to research" and "No response" no longer options
    - Any exceptions remaining over 12 months will be escalated to senior management and will be remediated prior to next destruction cycle
    - Monitor to assure downward trend of destruction exceptions

Go Forward Strategy

- **Institute Imaging Standards**
  - Images must comply with ESIGN, UETA, other laws and regs
  - Destroy paper after conversion and validation (5 – 60 days)
  - Develop an exception list – wet signature/others that need to be retained, so all other documents can be destroyed
  - Establish a quality threshold
  - Define what meets the definition of an error

Go Forward Strategy

- Imaging Efficiencies
  - Business processes will be digitized if the business case supports it
  - Digital images will be captured early in the process
  - Imaging Service Centers identify business processes ripe for conversion
  - Technology Infrastructure Group move existing technology to common, go-forward infrastructure compliant with standards
  - Roadblocks will be eliminated so compliant imaging systems can destroy the paper after conversion

Go Forward Strategy

- **Narrow the Scope of Legal Holds**

  - Legal will spearhead an effort to reduce the scope of records flagged responsive to legal holds piloting a specific business

  - Legal holds will contain relevant starting and ending dates of records that will be responsive to help narrow the preservation requirements

  - Destruction of records deemed non-responsive significantly reducing inventory

  - A repeatable process enterprise-wide

Summary

- Assure physical and electronic records are managed efficiently and effectively
    - Reduce duplication
    - Assure records are destroyed at the end of their lifecycle
    - Assure business processes are digitized where appropriate

Questions??

- Contact Information
  - Sandra Broady-Rudd, CRM
  - Phone: 608-429-2368
  - E-Mail: sbroadyrudd@yahoo.com