

From “P” to “E” in 60 Seconds; E-Records Initiatives at Wells Fargo

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Together we'll go far



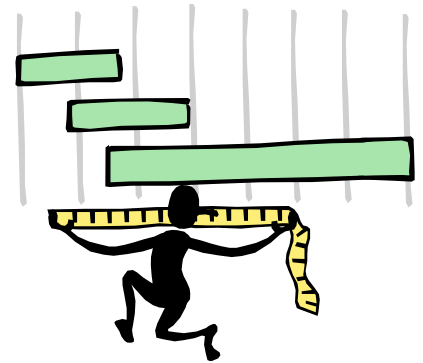
Learning Objectives

- Developing an E-Records Roadmap
- Leveraging Existing IT Projects/Tools
- Learning How Wells Fargo's E-Records Initiatives can Jumpstart Your E-Records Program



Developing an E-Records Roadmap

- What's Keeping Senior Management, Legal, and Records Decision Makers Up At Night?
- Completing a Risk Analysis
 - Legal
 - IT
 - Records
 - Lines of Business – part of standard risk analysis process and tools
- Rating of Importance in Developing Timelines
- Can't Eat Entire Elephant – Chunk out Small Pieces to Tackle – 3 – 5 yrs



Typical High-Level Risks

- E-Mail
- Unstructured – Desktop, File shares
- SharePoint Sites
- Social Networking



Leveraging Existing IT Projects/Tools

- (NNN) ?
- Sweep the Organization for Existing/Upcoming Projects
- Partner with IT/Messaging/LOB Subject Matter Experts (SMEs)
- Leverage Existing Tools – Microsoft Exchange/Outlook, Documentum, FileNet, SharePoint, Asset Mgmt Tools
- Find a Front/Back Door into Project Methodology Processes for Your Organization
 - Business Requirements Documents
 - Project Sizing
 - IT Templates –ARMA Madison Seminar



E-Records Initiatives

- IT Records Map
- Mailbox Management (2010 – Present)
- RIMA
- Big Bucket Retention Schedule
- Standard RM Requirements for Systems
- RM Requirements – Sunrise, Maintenance, Sunset
- Standard Litigation Response Process



Policy Changes

- Enterprise Compliance Timeline
- Email Records Retention controls in place for all existing and incoming new team members.
 - 6 months for the inbox
 - 3 years for the mailbox
- Removal of use of PST Files
 - Blocked ability to add to or create new PST files
- Removal of all legacy PST files
 - Compliance effort to locate and delete all PST files
- Any email needed beyond 3 years must be moved to the corporate archive
- Move to a Big Bucket Retention Schedule to better support electronic records
 - 2005 moved to centralized functional based retention schedule with 230 record classes
 - 2007 first pass at big bucket and dropped to 180 record classes
 - 2008 dropped to 150 record classes
 - 2009 Wachovia merger and no record classes added
 - 2013 major change from 144 record classes to 42

Change Management Issues

Most difficult aspect of the project and where the most thoughtful planning and execution is required.

- Every employee must understand the concept of official or business value records
- Every employee must understand the Records Retention Schedule and begin to make classification decisions
- Company is taking destruction control of email out of hands of employees by setting auto delete rules
- Employees feel loss of control with deletion of email and PST files
- Lot of fear from employees about ability to produce data when needed

Change Management Recommendations

- Build a communication plan for the year to include the following:
 - Topic
 - Audience
 - Senior leaders
 - Managers
 - Employees
 - Distribution Channel
 - Direct Email
 - Company intranet
 - Newsletters /Articles
 - Line of business channels
 - Publication Date
 - Key Messages
 - Owner to deliver the message
- Work with lines of business to define messages to communicate and appropriate delivery timeline
- Communicate often with a consistent message across all target audiences and channels

Change Management Recommendations

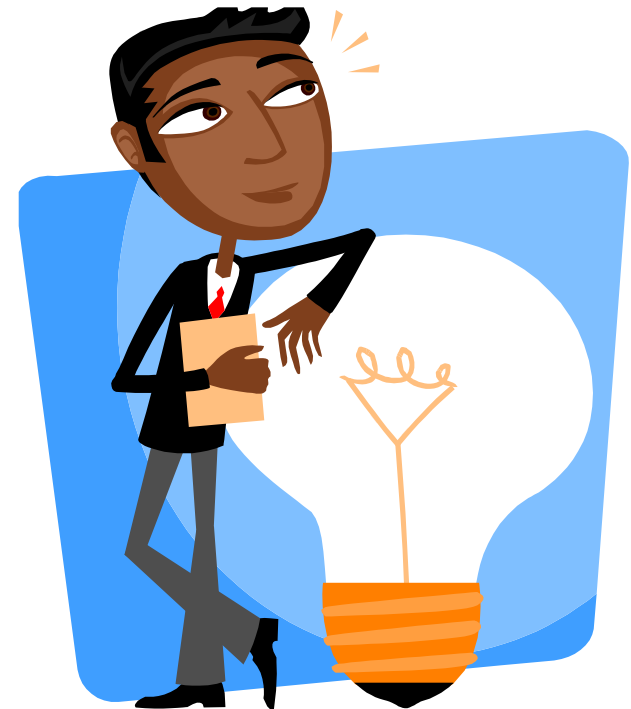
- Build training materials
 - Must be in language that general employee can understand
 - Simplify the message and tasks required by the employees
 - Use multiple delivery methods to reach the broadest audience
 - Slide presentations
 - Videos
 - FAQ's and training documents
 - Demo's or live sessions
 - Train the trainer

Lessons Learned

- Change Management is biggest challenge
 - Communicate often through multiple channels
- Engage any areas of the organization impacted by the changes
 - Line of business representatives, legal, eDiscovery, Messaging, desktop/network support, storage management
 - Do not forget the help desk teams – they are typically front line of defense
- Review and realign compliance and implementation timelines as needed
- There are many ways to bring data into compliance
 - From a technical perspective, you cannot create the architecture in a vacuum, you will need to talk to eDiscovery, information security, SOR owners
- It can be difficult to find the “owners” of data in the wild

E-Records Initiatives in Your Organization

- Current Initiatives
- Solicit Additional Ideas on How to Get an E-Records Initiative Started



Questions



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