

EVENT-BASED RETENTION GUIDE



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WHY READ THIS GUIDE

The goal of this Guide is to present practical solutions to address the challenges of event-based disposition.

Event-based retention is defined as the process by which the disposition of records, irrespective of format, is linked to the occurrence of a particular trigger event, such as an account closure or employee separation, rather than simply to the passage of time. Knowing when a trigger happens is a constant challenge to ensure the timely and compliant disposition of records. As the volume of information grows, organizations and their Information Governance (IG) professionals are seeking strategies to simplify the destruction of records and data while still being able to demonstrate their disposition practices are legally defensible.

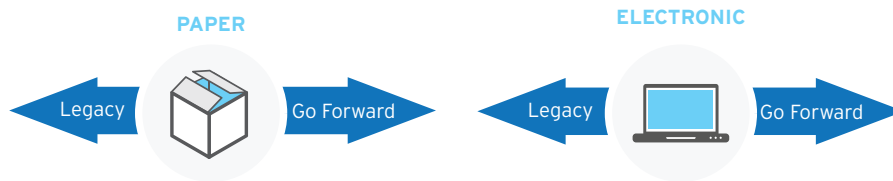
It is neither cost-effective nor prudent from a risk perspective to hold on to records indefinitely simply because retention and disposition dates cannot be definitively determined. The Records and Information Management (RIM) community needs to identify best practices to help organizations remove the obstacles inherent in event-based retention and propose ideas for executing strategies in our own environments.

The reader may use this Guide to help educate senior leaders about the complexity of defensible disposition of event-based records and to raise awareness about potential solutions that may require additional resources.



INTRODUCTION

While event-based retention is a challenge for all record formats, methods for managing paper and electronic records can vary significantly. This Guide states the universal challenge, then addresses paper and electronic records separately. Included are “how to” strategies for handling both legacy and go-forward scenarios. It also indicates any areas where a common approach may be suitable for both.



DEFINITION

Retention rules found in Records Retention Schedules fall into three general categories: fixed or time-based create date, event-based and indefinite. The scope of this Guide is limited to addressing event-based records as defined below.

An event-based record (EBR) is a record that requires an event to occur to “start the retention clock”. Once the clock starts it is possible to calculate the record’s eligible disposition date. Unlike records with a fixed or time-based retention where the disposition date is calculated based on the date the record was created, an EBR’s event “triggers” the transformation of an actively used document to an inactive, fixed-based retention record based on the date of the event.

Typical event triggers include, but are not limited to:

- closure of an account
- expiration/termination of a contract
- termination of employment
- settlement of a legal matter
- completion of a tax audit
- replacement by a more current version of a record

SHORT DEFINITION:

A record that is retained for the period of time it is active (in use) plus an additional amount of time once it is no longer deemed active or when a triggering event occurs, such as when an employee leaves an organization or when a project is complete.

To calculate the disposition date for EBRs an “event trigger date” is required. After its active use, the retention period for a record begins when an event occurs and is extended by some additional time (i.e., years, months, or other increment). For example, an employee’s record retention rule would be written as “employee termination date + X years.” Common event-based examples include:

RECORD TYPE	EVENT
Loans: Legal documentation	Paid off, closed, lending relationship ends
Contract	Contract is concluded or terminated
Estate administration	Account is closed or legal action concluded
Insurance claim	Settlement of claim, including all appeals
Employee record	Employee termination date
Job description	Superseded by more current version
Client account	Account closed
Tax filing	End of fiscal year

Less well-defined, ambiguous descriptions of events can include:

- date of action
- date of event
- property is unblocked
- active use
- end of use or
- life of product

In some instances, more than one piece of information or multiple events may be required to determine when the retention/disposition start date has occurred (i.e., associated account numbers and related project numbers).

With the emergence of the use of data analytics for organizational competitive advantage, some records may take on a new classification and retention rules may change after requirements of the EBR are met, such as “keep an additional 30 years for trend analysis.” In these cases, further action may be necessary to remain compliant with laws and regulations, especially in regards to protecting private information. Consideration must also be given to the potential discovery-related risk and costs of keeping records longer than the designated retention requirement.

DESCRIPTION OF PROBLEM

Every Records Retention Schedule contains retention rules that require an event to occur before the retention/disposition clock starts. Often, upwards of 50% of an organization's retention rules fall into this category. And, most organizations continue to struggle with an effective way to "flip the switch" and begin the disposition eligibility count down. In fact, recent statistics show that 67% of organizations agree that their RIM program would benefit from fewer event-based retention periods.¹

This Practical Guide offers some potential options for tackling the event-based retention conundrum in all industry sectors. The reader will need to consider their organization's risk profile, legal and regulatory obligations, ability to commit resources, and attitude towards keeping everything "just in case" or for use in analytics to determine if one or more of the options could help improve the retention profile.

At the heart of the struggle for compliance with event-based rules is the reliance on an individual or workflow to indicate - and communicate to

the appropriate system of record - when these trigger event(s) occur. This knowledge exists in the business unit or department in which the records are created, received, and/or managed, which puts the responsibility for declaring a trigger event squarely on their shoulders and not on those of the RIM department or IT staff.

With increased regulatory scrutiny of the management of customer information and growing expectations of employees and shareholders to have their information protected and secured, the pressure to institutionalize a process for handling EBRs has intensified. In the financial services industry, this pressure is driven in part the demands of regulatory bodies, including the Office of the Comptroller of the Currency (OCC) and the Prudential Regulatory Authority (PRA) in the United Kingdom (UK).

67% AGREE

THERE SHOULD BE FEWER EVENT-BASED RETENTION RULES

- COHASSET ASSOCIATES, 2014
INFORMATION GOVERNANCE
BENCHMARK SURVEY



¹ Cohasset/ARMA 2013|2014 Information Governance Benchmarking Survey

COMPLICATING FACTORS

In addition to the reliance on individuals or workflow processes to communicate a trigger and the often ambiguous nature of event trigger dates there are many other factors that make management of event-based records so difficult. Here are some examples of complications that can occur:

Co-Mingled Records	It is often impossible to assign a single trigger even to a single “container.” That “container” could be a box holding paper records or an application, tape or spinning disk storing data or files.	These containers hold mixed records types with different retention periods created by various users, making it impossible to apply a uniform set of retention rules to the contents.
Poorly Defined Trigger Events	The definition of what constitutes an event can be ambiguous, making it extremely difficult to declare a retention start date.	“Date of Action” or “Life of Product” are too wide open for interpretation to function as effective trigger events.
Lack of Definitive Event Trigger Data	Some events do not have a well-defined trigger date and are thus dependent on analysis to be established.	Deposit and Investment Accounts do not always have a specific closure dates and can be re-opened within a defined window.
Multiple Customer Relationships	A customer may engage with more than one line of business within an organization	A customer may have a checking account and mortgage with the same bank. If one account closes, the bank has to decide to either keep all the records or create a trigger event for a specific set of records.
Data Analytics	Records created for one reason may take on a different purpose for use in data analytics.	One set of records may be analyzed from both a customer experience and improved efficiencies standpoint. This interconnectivity between units corrupts their initial individual designation classifications and retention rules.
Multiple Systems of Record	More than one System of Record (SOR) may exist within an organization. A lack of awareness regarding which is the definitive SOR or which is the appropriate SOR for a specific type of record can lead to inaccurate retention rules.	A single organization may have several SORs, including: electronic content or records management applications, physical records inventory applications/ spreadsheets, Human Resources systems and contract management applications.

RECOMMENDATIONS FOR MANAGING EVENT-BASED RECORDS

The following approaches to managing records with event-based retention, regardless of format, are proven practices adopted by a variety of peer organizations. In many instances, recommendations were made to a RIM Steering Committee or Information Governance Council (typically comprised of representatives from IT, Legal, Compliance, Business Units, and RIM) who ultimately made the decision to proceed.



In each scenario, the organization must adopt a risk-based strategy to managing EBR disposition for physical and electronic content. Records with higher risk, or value, require greater clarity than records with lesser impact. Degree of risk can help to prioritize where to begin the process of meeting the event-based rules challenge.

GENERAL

PERIODIC REVIEW OF CONTENT



Schedule a consistent, periodic review of records that fall within the event-based classification set. While not popular or always practical, this approach is the default for monitoring records for which a trigger may have occurred. Examples of possible trigger events include: the termination of an employee, completion of a program or project, repayment of a loan, or termination of a contract. Business unit personnel need to keep track of these events in order to search applications or repositories in which a relevant record is stored. When a trigger has occurred for a record, the event date must be entered into the designated system of record in order to begin the retention countdown.

Information about the event must then be acted upon. These actions could include pulling specific paper files from boxes for repacking or entering metadata into a records management system for both paper and electronic records. Ideally, this activity can be supported by the use of technology in the form of search terms or more sophisticated business process automation or other methods of identification and classification of EBRs.

-  Action can be taken to enact the eventual defensible disposition of records to comply with policy, reduce storage costs, and satisfy regulatory obligations to protect private or sensitive information.
-  This approach is labor intensive and is dependent on a sophisticated business process. It requires an individual with access rights to query applications and/or consult routinely with business unit staff to determine if and when a trigger event occurred. The subsequent follow up is time-consuming and difficult to automate.



REFINE EVENT-BASED DEFINITIONS

Review the Records Retention Schedule to determine if the descriptions of trigger events are clear and unambiguous. In the case of a “fuzzy” definition, such as “date of event,” clarify the condition(s) of the event. This clarification requires input from the business unit that knows the record’s purpose and is responsible for, or aware of, the occurrence of the event. It may also require input from other sources, such as your Legal team, to determine a clear definition of the event.

-  A coordinated effort across stakeholders to define events clearly and accurately simplifies retention rules, which in turn facilitates defensible disposition and compliance with policy. The exercise can also aid in opening up lines of communication with business units.
-  This effort can be time-consuming as it necessitates input from multiple sources. In some instances, the definition may remain ambiguous because the trigger is open to interpretation and no satisfactory consensus can be reached, leading to a tendency to default to indefinite retention. If a “big bucket” approach to record classes is used, there is the possibility that no single definition of a triggering event exists.



WORK IN PROCESS TO RECORD CONVERSION

It may be possible to manage some physical and electronic records as Work in Process (WIP) until the event occurs, at which time they are declared a record and the retention clock starts. An example is a form of transaction which typically closes within 1 to 2 working days. Once the transaction is concluded, then the WIP becomes “official” and can then be declared a record.

-  This method is a logical and defensible way of managing event-based records especially if work has already been done to define content types and how they move through their lifecycle to eventual declaration as a record, most likely within a content or business process management system.
-  It may be challenging to identify the record declaration candidates. Supporting policy needs to be written to document their formal transition from WIP to declared records, along with associated rules. At a minimum, this method requires buy-in from the business units that own the records.

DEFINE RULES BASED ON WORKFLOW OR PROCESS

A specific point in a workflow or business process can indicate a trigger event, such as when a contract is submitted or a project is closed. If so, this point of the workflow should be leveraged to determine the retention start date.

-  This approach would enable the tagging of a record as it moves through a workflow, including the final trigger event, rather than deferring a decision to be made when the record is removed from the work stream and is no longer active.
-  The business process or workflow has to be identified and analyzed. The assignment of metadata must be documented as a record moves through the process, including the final step that triggers the retention start date. If possible, workflow should be automated, which may require extensive system and process enhancements for lifecycle management of records.

EVENT REGISTRY

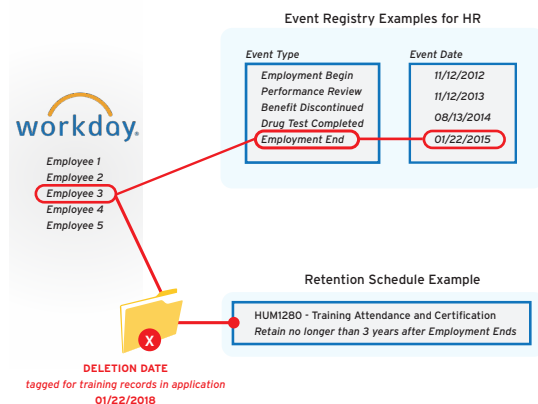
While this is not yet a widely available option, the creation of an “event registry” could be a practical solution to the EBR challenge. A secure central registry with proper access controls would be created by an internal team or purchased/licensed from a vendor. Either a person or an application could use the registry to log events as they occur and then use the logged events to determine accurate trigger dates. This approach would be equally successful with both physical and electronic records.

When an event occurs, it is *pushed* into the registry. In an ideal situation, the system or application that facilitates the business process would automatically feed the registry with triggering information. If this option is not available, business unit staff could enter the information directly into the registry.

Systems may be set in “listen” mode that then pull the event or trigger information into a receiving application or system of record either manually or using technology. This activity could be automatic or one that is scheduled to occur with a predetermined frequency.

The central event registry would need to be established to accommodate both push and pull access. A taxonomy or index of critical fields, such as unique identifiers, is fundamental to success, as is a policy for the registry’s use. Ideally, a cross-functional oversight body would be established to govern what is put in the registry. Among other things, this body would ensure there are access controls to protect private or sensitive information and to outline responsibilities for the maintenance of fields.

The following diagram depicts the registry concept.



In the example above, a registry has been created for Human Resources. Event Types identify the various action items or triggers related to employee records. In this instance, Employee 3's employment has ended. The "Employment End" event type is selected and the date of separation is entered. The separation event is connected to various types of employment records in the Retention Schedule, such as training attendance and certification which has an ACT+3 retention rule. Using the event date, the eligible disposition date can now be calculated and passed to the System of Record for training and certification records.

- + A central repository for logging events would simplify the need to search for relevant records either within applications or by interacting with business unit personnel. Both automated systems and authorized individuals would have access to the registry.
- Processes would need to be established, monitored, and enforced to guarantee that business units update trigger events as they occur or on some required routine basis. Access controls would be mandatory. Considerations for global use must also be fully explored before implementation. Connectors have to be written to both receive the information from systems as well as to push them out to targeted records repositories. This approach requires funded development along with maintenance and constant cooperation between the business units and technology. (This solution is a sophisticated one not yet offered by software vendors.)

CONVERT TO FIXED DATE RULE

Popular practice is to review the Records Retention Schedule for opportunities to convert classes of records with event-based retention rules to "create date" or "fixed date" rules. This process includes consideration of the level of risk associated with a group of records, the ability to project the average life or longest life of the record given its use or purpose, as well as legal versus operational considerations.

It is important to fully understand and challenge any interpretations made for ambiguous legal and regulatory requirements that result in an event-based retention rule. If a specific event-based regulatory requirement does not exist, keep the retention requirement simple by setting a create date period.

This exercise must be a collaborative effort that may include representatives from Legal, Compliance, RIM, Business Units, Privacy, Risk, or other functional areas depending on your organization.

If a clear trigger cannot be identified then the class or category of records may be a candidate for a fixed date rule. For example "life of product" might mean "until the product is no longer made/sold" or "until there are no more customers for this product." Those dates may be vastly different. However, this ambiguity can be addressed by a consensus of several departments. In this case the business unit, Legal, Compliance and RIM may be satisfied with retaining the records in question for a certain number of years, such as 25 or 50, which would be the anticipated life of a product or financial instrument.

It is important to periodically revisit record classes for which create dates were selected in order to assess the rules for accuracy. After tracking activity over time, the actual life of the records may turn out to be significantly less than an estimated 30, 50 or 75 years. For example, it may transpire that a 30 year mortgage is consistently paid off within 6 to 7 years. If the facts allow and all constituents agree, retention rules should be adjusted to a more realistic time frame to mitigate risk. This review could be included in an audit plan to ensure that an attempt has been made to better align create date rules with reality.

+ While this approach may not be ideal, it does allow for a decision to be made about a record's end of life, rather than deferring the decision far into the future. The fixed date rule could be applied to either physical records, or to an application or system, depending on the homogeneity of its records, to execute eventual destruction.

- The major disadvantage of this approach is that it over-extends the retention period of records that could otherwise be defensibly disposed of sooner, thus exposing the organization to increased storage costs along with increased liability and costs for legal discovery or Freedom of Information requests. It can also be difficult to assign a fixed date rule to certain classes of records given their retention complexity.

The following table includes examples adopted by organizations for converting records from event-based to fixed, along with the logic used to justify the conversion. Please note that these are for illustration purposes only; they are not to be adopted without input from the necessary parties at your organization.

RECORD TYPE	EVENT-BASED RULE	RECOMMENDED CREATE DATE RULE
Mortgage files	6 years after the loan has been paid.	36 years. Length of longest mortgage offered by the institution is 30 years + 6 year retention period after trigger event.
Tax planning and forecasting	1 year after the plan is no longer in effect.	3 years. Tax planning is 12-24 months out.
Copyrights	20 years after the life of the copyright	130 years. Corporate copyrights are valid for 95 years from publication or 120 years from creation, whichever expires first. 130 years covers the life of all copyrights plus an additional 10 years.
Advertising and Marketing Material	6 years after the material is no longer in use and being marketed	7 years. Most advertising and marketing material is in circulation for a year or less before being updated or superseded.

Refer to Use Case 4 later in this Guide for more insight into replacing event-based retention rules with fixed period rules.

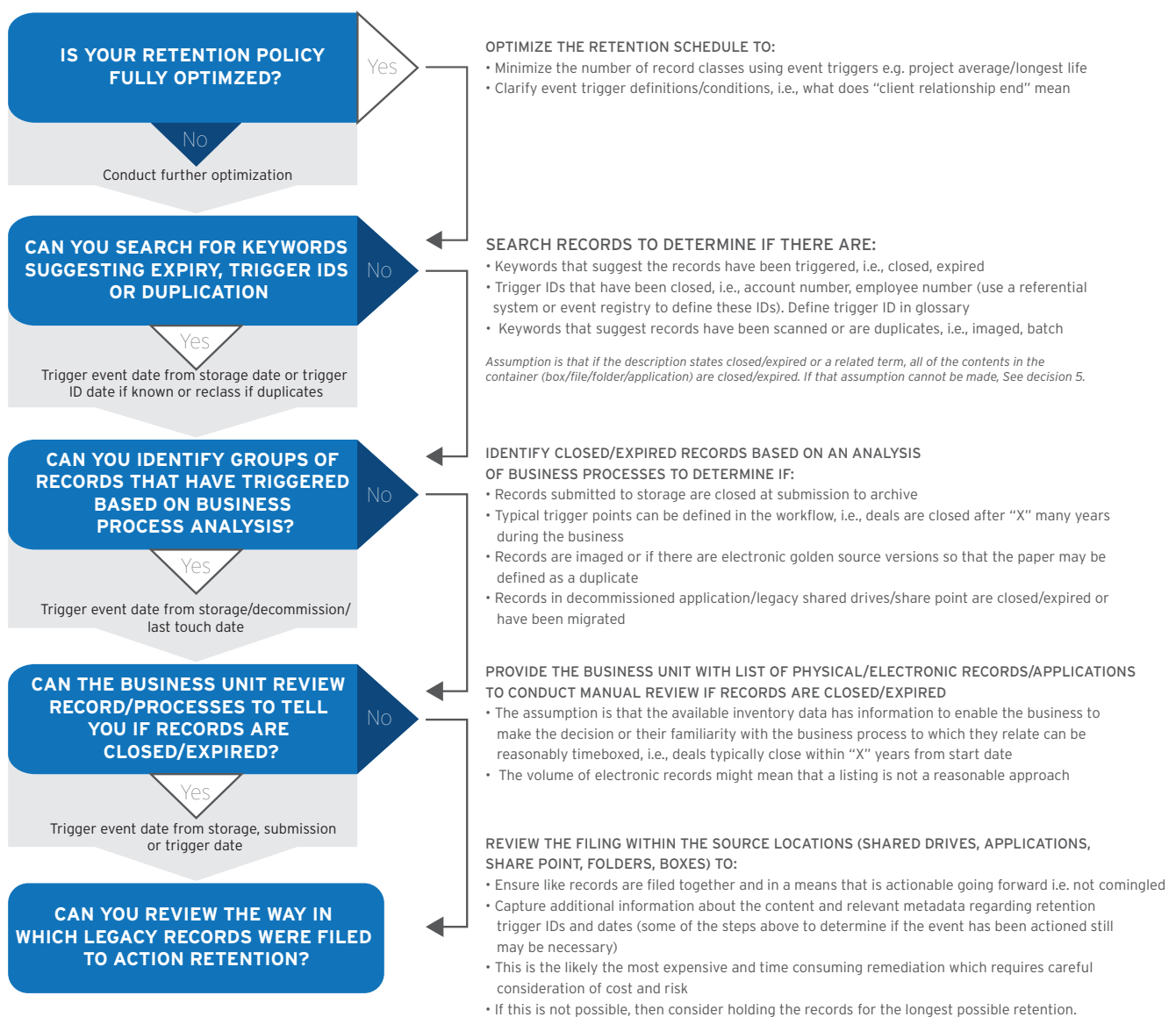
DECISION TREE FOR RESOLVING EBR TRIGGER CHALLENGE FOR PAPER AND ELECTRONIC RECORDS

The following decision tree can be used to facilitate action for managing event-based retention records. It was constructed based on these assumptions:

- A Records Retention Schedule exists and it clearly shows which classes or groups of records use event-based rules.
- Risk, Compliance and Legal have been involved in the development of your strategy and

methodology to ensure that the appropriate level of risk is adopted for your organization.

- A proof of concept has been applied in development of a methodology.
- Records can be sampled to confirm assumptions.
- The methodology and decision-making process is fully documented.
- Once established, the process can be applied to records in offsite storage and electronic record repositories.



In conclusion, an organization might consider using one, two or several of the above approaches for dealing with EBRs. Even if only one is found to work well, headway will have been made in the management of event-based records.

PHYSICAL RECORDS

Provided that space is available, active records can be kept onsite until the event occurs, then packed up and moved offsite once the retention countdown starts. However, there are considerable risks and potential costs to onsite storage. In the case of large quantities of files, such as employee records or contracts, keeping all active files onsite is typically not an option. These records are most often stored offsite until a trigger event is identified and communicated. Rendering an active file into closed record subject to retention rules. Ideally a “switch communication” can be accomplished systematically through a feed from the business application to the vendor repository.

Company policy should be clear on which records can be stored onsite and offsite and how they should be managed to ensure proper protection, use of space and more.

EXISTING OR LEGACY

While effective ways of handling go-forward event-based records may be in place, you must still deal with all the records that came before new methods or protocols were implemented. We refer to this category of records as either existing or legacy.

To aid in the review of existing or legacy event-based paper records stored in cartons we recommend using a decision tree to facilitate ascertaining what records are in a box. All avenues for identification should be explored before the potentially costly decision is made to start “lifting lids.” For example, determine whether there are reports available to review inventory and make determinations on which record code(s) should apply to a group of boxes. Such determinations can be made by examining ownership information or descriptive information and then making some educated assumptions about the content, depending on the organization’s appetite for risk. If a detailed indexing of what records are in a box is not available, running an analysis against available metadata or descriptive data using closed or expired terms, projects, accounts or other key words can be used to assist in the identification of cartons containing affected records.

Another option is to run a report that lists all cartons containing event-based records and then distributing them to the business units, departments or divisions associated with them. RIM staff can assist in the steps required to determine whether trigger events have occurred.

Remember that defensibility is the goal, not perfection. Your Legal or Compliance team should be able to determine what qualifies as “defensible” in your organization.

CONVERTING PAPER TO DIGITAL RECORDS

Both for legacy and go-forward treatment of records, depending on factors such as retrieval activity or multiple points of access, it may be desirable to image or scan original paper records to create an electronic version which could be declared as the “official” record. It is recommended that an analysis take place to determine if the benefits of such an exercise justify the cost of the effort and if the records are subject to any legal or regulatory rules/requirements prohibiting the electronic version from being the “official” record.

WORST-CASE SCENARIO

“Flip the lid” metadata capture requires that businesses physically review (or contract with a third party to review) a statistically significant sampling of inventory segments to determine the appropriate metadata to apply to records, or to separate content so that only records of one type are held in each carton. This activity can be expensive and potentially subjective based on reviewers, but it is better than taking no action at all.

GO FORWARD

The most important recommendation for managing physical event-based records going forward is to avoid commingling different types of records in the same box. Whenever possible, common types of records in a box, such as personnel files, should share a common disposition date to facilitate decision-making. For example, it would be acceptable to place employee files of all employees who terminated in a particular month in the same box, since the trigger dates for all of those files is approximately the same. It would not be advisable, however, to commingle files of terminated and active employees in the same box.

There should be mandatory fields designated to ensure that all requisite information is provided. This facilitates accurate record identification and enables a disposition decision. This classification would include metadata, such as pre-determined index terms or the use of a taxonomy. The minimum amount of information required for analysis and retention/disposition decision-making for boxes of records is:

- owner of the records indicated by cost center, division/department or other ownership identifier

- category (class code/bucket/record code) which connects to retention rule
- description
- key gates (the “from/ to” span of time for records in the box, or if not available, the date the box was sent to storage)
- trigger for the event
- jurisdiction/country/applicable Retention Schedule

If a business unit keeps a full index of employee files stored in a box, the files could be managed more easily over the life of box. While it may not be cost effective, the business could recall the box, remove files eligible for destruction at the appropriate time, and then return the box to storage.

Active file management, or open shelf filing, should be considered as a viable option for records with event-based rules. This methodology allows for a focused and individual approach for managing records rather than dealing with many records in a storage box. If implemented, it is critical that disposition rules are clear for how to manage the parent carton containing indexed “child” files. The parent should always inherit the retention properties of the youngest child in the box, so that the box isn’t destroyed until the last remaining file is destroyed. Routine consolidation efforts can help limit near-empty boxes from taking up shelf space for long periods of time.

Clearly written and published procedures, as well as employee awareness programs outlining employees’ responsibilities, are critical to success.

ELECTRONIC RECORDS

Organizations are anxious to connect Records Retention Schedule rules to content in electronic systems in order to improve compliance with policy and gain control over storage costs. Unfortunately, business applications have shown varying degrees of success in building functionality to allow for the retention of records according to a defined policy, let alone to track and purge records based on trigger events. While the desire for a consistent enterprise approach to manage records regardless of their format or retention rule is strong, the ability to straddle the gap between intent and practice is weak.

Retention Schedule rules must also be applied to content in electronic systems in order to demonstrate compliance with policy, control storage usage, and limit discovery and privacy risk. Many existing applications will need to develop enhanced functionality to classify content according to the retention schedule, accommodate any required triggering events, and purge records in accordance with disposition eligibility dates.

EXISTING OR LEGACY

The calculation of a create date retention/disposition for an electronic record is typically straight forward. In some applications the “Date of Creation” (or another mutually agreed upon rule such as “Ingestion” or “Archive” date) can be identified and a retention rule associated with the record type can be applied. If so, simple math then determines the date on which a record is eligible for destruction or deletion from the system. Taking action on EBRs within applications or repositories may be more complicated because of the complexity and variety of triggering events, and an application’s potential limitations.

While some applications may have native capabilities that can be enabled to accommodate complex retention rules, there still needs to be a method for communicating the trigger event. This method could be as simple as a human checking a box on an HR application to indicate that an employee is no longer with the organization, or as sophisticated as a thoughtfully designed automated workflow that indicates at which point in the process a trigger is

activated. While anticipating a trigger event within current applications may be a simple task, it is difficult and costly to update most applications and repositories to communicate and calculate retention after a triggering event has occurred.

Another common challenge lies in managing “dark data”, particularly records that exist in obsolete applications - those that have been retired but still contain content created or received by the organization. When the application is retired, RIM staff, along with business unit owners, should assist IT in determining whether records have met their retention requirement. If they have not, the records should be migrated to an archive system that allows for their management. Alternatively, future access to the retired application must be guaranteed.

In cases where content is migrated from one application to another, the reason for the migration is often aligned with the triggering event (such as “end of use”), which means that the target application may use the date of ingestion as the retention start date (or the date the retention countdown begins).

GO FORWARD

There are a number of suggestions for managing electronic EBRs “day forward.” As always, practitioners must balance the risk and cost of implementing a technology driven solution.

Options for managing the defensible disposition of all electronic records, including event-based are:

- Control of semi-structured and structured content in applications if they contain homogeneous records; e.g. only those records associated with accounting or claims. If not co-mingled, use the longest of the retention rules of the records within the application to drive disposition. Exceptions may need to be made for individual records. Document all decisions for creating this “eSchedule.”
- Manage at the record level whenever possible in applications or repositories, such as an image archive.

- Manage records by “batch” or use a parent/child hierarchy in order to apply a single record code or retention rule to the content. With a batch of records, apply the retention start date of the youngest record as the retention start date for the entire batch.
- Use a central archive for unstructured and structured content so that the concept of “onsite storage” applies in the digital space. Individual business applications store content while it is active then send it to a central archive (along with a record code) when it becomes inactive and the retention countdown is to begin. The central archive - which is fed rules from the retention schedule - applies the retention period to the date of ingestion and begins the countdown immediately.
- When using tape or any other external media, create a policy that prohibits comingling and encourages use for disaster recovery purposes only. If records are moved to an archive, index their contents to facilitate retrieval and management through end of life.
- Use an event registry as described earlier in this Guide that enables an Application Programming Interface (API) or users to push and pull events from and into systems of record.

METADATA BEST PRACTICES

The creation and maintenance of relevant metadata is a critical activity in the responsible management of both paper and electronic records. Metadata is indispensable for many purposes including locating records, establishing ownership, indicating whether the content includes Personally Identifiable Information (PII), defining the records’ impact based on risk or value, and for identifying records that have fulfilled their retention period and can be disposed. Metadata can also be used to determine who should have authority to view and edit records. Metadata can be of critical importance in legal, audit or regulatory activity because it helps demonstrate the authenticity and reliability of responsive records.

For physical records, core metadata elements or index terms have been long-established: record class code, from and to dates, description, shelf and warehouse location, etc. Yet, individuals who send boxes offsite often fail to populate all the requisite information needed to manage the box responsively. This failure is why it is critical to have systems and processes in place that enforce the proper application of accurate and complete metadata throughout the life cycle of all records, but especially during the transition from onsite to offsite storage.

Similarly, with electronic records, all applications maintain some native metadata about their stored records, but not usually the complete set of metadata elements required for records lifecycle governance activities.

Consistent use of accurate, complete metadata is crucial element of effective records management and can be a vital tool in the process of identifying trigger events in EBR management.

In conclusion, the objective of metadata is to allow your organization to have enough information about your content to locate it and to make decisions about it as it moves through its lifecycle.

Refer to Appendix A for more information on Metadata management.

ROLES & RESPONSIBILITIES

It is important to consider an organization's culture and business structure in order to understand with whom the RIM professional must collaborate in order to guarantee the success of managing EBRs.

The following are high level descriptions of the roles most likely to be involved in event-based retention decisions, along with their respective responsibilities. Depending on the specific organizational structure, the roles may have different titles and/or some functions may be combined, such as Legal and Compliance.

RECORDS AND INFORMATION MANAGEMENT (RIM)

The RIM function provides policy, governance and consultation for program users. It is not typically a RIM function to dictate how systems or processes execute on Records Management Policy. Nor does RIM provide funding for system or process enhancements needed to execute on Records Management Policy or Retention Schedule compliance.

BUSINESS UNIT

The business unit that owns the records should drive continuous collaboration with Technology,

in consultation with RIM if necessary, to design/enhance systems and processes to comply with Records Management requirements.

LEGAL/RISK

The Legal and/or Risk departments are a critical resource when determining a workflow or the methodology for handling EBRs. Legal can and should provide guidance on the appropriateness of, for example, converting an event-based retention rule to a create date rule. It is critical that Legal weigh in on any decision that results in over-retention of records.

COMPLIANCE

Compliance's role when dealing with EBRs is to alert RIM of instances in which the proposed handling of EBRs may cause an organization to run afoul of regulations, such as those dealing with privacy and data protection.

TECHNOLOGY

The IT department is responsible for carrying out the rules that RIM and the business decide are appropriate for the disposition of EBRs within the organization's systems and applications.

METRICS

Once a method(s) for tackling the complexity of event-based records is determined, it is essential to track its adoption. Based on results, remediation efforts may be required in some business units or perhaps an adjustment to the methodology is warranted to ensure better implementation. The following are examples of how to measure compliance regarding the disposition of EBRs:

- Document the number of cartons containing event-based records prior to and post implementation. Track destruction activity over time.
- Conduct data analytics on repositories and applications where event-based records are stored. Monitor destruction activity over time.
- If event-based retention/destruction is added to existing RIM Risk Framework Controls, the rating assigned by business units can be monitored year over year.

USE CASES

The following four use cases have been developed by members of the Iron Mountain Customer Advisory Board to provide examples of how to apply event-based retention rules to hardcopy and electronic content.

The first use case applies to Human Resources records, a prime target for a solution to manage the records of terminated or separated employees.

The second use case describes the steps taken to convert event-based retention rules to fixed-based in order to satisfy a specific regulatory requirement.

In the final two use cases, loan records were selected because they are a very common type of electronic record in Financial Services, generally with high volume and therefore high potential for both risk reduction and cost savings. While the details may be specific to loan records, the use cases have general applicability to other types of records in all business sectors.

Please note, the examples are written at a high level. Individual institutions can leverage the studies to develop their own use cases relative to their unique situations.



USE CASE 1: APPLY RETENTION RULES TO HUMAN RESOURCE RECORDS

DESCRIPTION OF ORGANIZATION

A United States-based investment and insurance company with property and casualty operations, group benefits and mutual funds.

CHALLENGE:

Human Resources (HR) records are a particularly difficult problem because they must be kept active while the employee remains employed and for a certain number of years after the employment terminates. The length of time employees may work at the company can span from weeks to decades.

Many long term employees may change their name once or twice during their employment, adding to the complexity of record keeping. In addition, employees can leave the company and be rehired, turning previously inactive records active again.

In this use case, Human Resources records were spread across the organization, housed in central file rooms at the Home Office, various field offices, and in file cabinets in manager's offices. Finding HR records when needed for litigation or regulatory inquiries was a time consuming and difficult task, and the files occupied valuable real estate space. In field offices, terminated employee files were often held onsite for years, until enough employees had terminated to fill a box for long term storage, resulting in significant over-retention of records.

SOLUTION:

All active HR records were moved offsite by file into open storage at our off-site storage vendor. The storage vendor indexed the files using the employee's name and a unique employee ID number. Going forward, all new HR Records contain the employee's name and ID number, and the official copy is sent to the vendor to be filed in the employee's personnel file. Once a quarter, a list of terminated employees is sent to the vendor and those employee files are pulled from the open shelf, placed in a box or boxes and moved to long term storage. Those boxes are given an event date of the last day of the quarter, which starts the retention period for the records. If an employee is rehired, his or her record is pulled from the box in long term storage and placed back in active open shelf storage leaving the remainder of the employee files in the box to continue to count down their retention period.

The sensitive nature of the information contained in HR files makes security a top concern in this use case. Thus, the baseline requirements for success for Use Case 1 were:

1. Field office files were transported to the Home Office using a private courier service with a full audit trail so that any lost files could be identified.
2. Crews from the vendor securely picked up files from the Home Office and transported them to the local vendor storage facility.
3. The vendor indexed the files with a double blind check and then audited using the employee's first name and ID number.

RESULTS:

The use case has been declared a success. Files of terminated employees are being sent to long-term archiving on a quarterly basis. Records are now 100% catalogued allowing HR staff to know within minutes if the company has a particular file that has been requested. The physical file is generally received in the Home Office within 24 hours of the vendor receiving a request for retrieval. In addition, valuable real estate space that had been used to store the files has been regained.

USE CASE 2: IMPLEMENTING BUSINESS RULES FOR UNKNOWN EVENT DATES

DESCRIPTION OF ORGANIZATION

An international financial institution headquartered in the US with over 270,000 employees operating in more than 30 countries. Services include consumer and commercial banking, insurance services, investment banking and wealth management.

CHALLENGE:

Ensure the timely disposition of active hardcopy records in off-site storage when the event date to calculate destruction eligibility was unknown or in the future. Original efforts focused primarily on providing training and tools (retention schedule, job aids, inventory tracking systems) for those who must ensure that retention event dates are applied to all records considered closed/inactive. Despite these efforts, approximately 1.6 million boxes remained in storage without event dates.

SOLUTION:

The challenge was tackled by forming a task force consisting of the internal Records Management team plus selected members of the user community (to assist with user buy-in to the solution). Representatives from the Law and Audit departments were also active contributors. A detailed analysis of records with event date-based record class codes was completed to determine the volume of records with no designated event date. The various record classes were analyzed to establish a conservative, realistic active period for the various classes. For example, it was agreed that Trust records are considered active for 100 years; for bank account records, the active period is 50 years. When the analysis was completed, the recommendations were presented to the subject matter experts and Law Department and Audit Department representatives to gain their support for this project. The external storage vendor was consulted to determine the scope of assistance their team could provide.

Ultimately, business rules were established for standard “active” periods from the receipt date (the most reliably consistent basis) for all of the event date based record classes. Using these business rules, the vendor updated any blank event dates so a consistent destruction review date was calculated for each box based on the maximum active periods for each of the identified record classes. Using these “future” event dates, the vendor will then be able to calculate destruction eligibility dates, ensuring that all of the event date record classes are destroyed on schedule.

This project was not an “easy sell” to internal stakeholders (records coordinators, record owners and subject matter experts) and took over a year to complete. The analytics were presented to show the benefits to them and to the company, their feedback was welcome and incorporated into the process, costs were covered, and concessions made to certain groups, giving them additional time to add their own retention event date records before a global solution was applied. This ground work delayed completion of the project but enabled the stakeholders to be comfortable with the solution. One aspect worth noting is that this project was intended to be a “one time” project. However, the event dates will need to be revisited on a regular basis as record owners continue to transfer active records into storage. An exception reporting process will be set-up to facilitate this reporting. Additionally, businesses are encouraged to update any calculated event date with actual event dates as they are known.

RESULTS:

Other than project plan delays, the project progressed as expected. At its conclusion, reports were generated to confirm results. Event dates were added to 1,726,573 boxes of records in storage. Ownership of these records was spread across the enterprise. There will be both short and long term impacts on the business as a result of this project. In the short term, there is an increased expense resulting from the overall cost of the project and cost of increased destruction. In the long term, however, overall lower costs are expected due to reduced storage costs associated with destroying records in a timely manner. Also, a decrease in the risk associated with over-retention of records is anticipated –a bonus for increased information risk program consistency.

Along the way, some valuable lessons were learned, including:

- Always involve key stakeholders at every stage of a project of this nature
- There is no such thing as over-communication
- The business rules used for physical records are very different from those proposed for electronic records (this project focused only on physical records)
- It is not realistic to expect projects like this to be one-shot deals; the effort will need to be repeated at regularly scheduled intervals or automation will need to be incorporated into the process
- Finally, it is important to make things as easy as possible for record owners and other constituents to manage going forward.

As a result of these lessons learned, some future plans are being made to add some granularity to the process for determining “active” periods for event date records. For example, not all loan records have the same active periods. A mortgage loan will be active for a much longer period of time than an automobile loan. Incorporation of these distinctions into the process will improve accuracy and increase stakeholder buy-in.

A final observation is that a one-time project is not a permanent solution to this challenge. The ideal is still for record owners to manage their own retention events. Projects such as this tend to treat retention events with a broad brush whereas retention events really should not be a one-size-fits-all solution. But when record owners do not have the ability to manage these retention events, a solution such as that outlined in this use case reduces the risks and costs of over retention.

USE CASE 3: APPLY RETENTION RULES TO LOAN RECORDS IN A LOAN APPLICATION DATABASE

DESCRIPTION OF ORGANIZATION

A large financial services institution with operations in retail banking, specialized businesses serving companies and government entities, and asset management and processing businesses units in the United States.

CHALLENGE:

Paid-off loan records are retained in a loan application database past their required retention period. The goal is to identify records associated with paid-off loans, test for destruction-eligibility and purge from all tables of the loan application database if eligible.

SOLUTION:

In collaboration with loan application software administrators, business testers and approvers, and RIM, the following steps were established to meet the challenge:

1. A report is run of all loans that are not subject to legal hold and have been paid off for x or more years.
2. Pre-destruction approval procedure or automated work flow is executed and documented.
3. A pre-destruction backup of the loan application database is created.
4. A program is run to purge from all tables in the loan application database all loans that are past their required retention period and not subject to legal hold.
5. A report is generated by the purge program, identifying all purged loans by unique loan identifier.
6. A file is created by the purge program, identifying all purged loans by unique loan identifier, including loan payoff date. (See Use Case 4)
7. Post-destruction approval procedure or automated work flow is executed and documented. If this step fails, the imaging database is restored from pre-destruction backup.
8. Pre-destruction backup is destroyed after the period of time indicated in the post-destruction approval procedure.

If exceptions are identified in any part of the process, loans with exceptions are removed from the purge list. This entire use case would be suspended and ineligible if a blanket legal hold of any kind is currently in place that applies to the whole Lending system or process.

Baseline requirements for Use Case 3 to succeed are:

1. A field exists in the loan application database that records the payoff date of the loan.
2. A field or fields exist(s) in the loan application database that indicate(s) whether or not the loan is currently subject to legal, regulatory or audit hold. Alternatively, the database-purge software has flexibility to otherwise specifically exclude loans that are identified as subject to hold.
3. A formal Record Retention Schedule exists, with a retention period for loan documents of ACT + x years.
4. Software exists to identify loans in the database that have been paid off for x or more years and can purge them from the database so that they are unrecoverable.
5. Pre-destruction and post-destruction approval procedures or automated work flows have been developed.

RESULTS:

Paid-off loan records past their required retention period are purged from all tables in the loan application database and are unrecoverable.

USE CASE 4: APPLY RETENTION RULES TO LEGACY LOAN DOCUMENTS IN AN IMAGING SYSTEM OR DOCUMENT REPOSITORY

DESCRIPTION OF ORGANIZATION

A large financial services institution with operations in retail banking, specialized businesses serving companies and government entities, and asset management and processing businesses units in the United States.

CHALLENGE:

Documents associated with paid-off loan records are retained in an imaging database or document repository past their required retention period. The goal is to identify documents associated with paid-off loans, test for destruction-eligibility and purge them from the imaging database if eligible.

SOLUTION:

In collaboration with software administrators, business testers and approvers, and RIM, the following steps were established to meet the challenge:

1. A file is created from the loan application or applications, listing loans that have been paid off for some number of years, along with their payoff dates. Loans that are currently subject to legal holds have been excluded (See Use Case 3).
2. Pre-destruction approval procedure or automated work flow is executed and documented.
3. A pre-destruction backup of the imaging/document database is created.
4. A program is run to match documents in the imaging database to the disposal candidate search criteria.
5. Documents matching the paid-loan file are purged from the imaging database.
6. A report is generated by the purge program, identifying all purged documents by unique loan identifier.
7. Post-destruction approval procedure or automated work flow is executed and documented. If this step of the process fails, the imaging database is restored from pre-destruction backup.
8. Pre-destruction backup is destroyed after the period of time indicated in the post-destruction approval procedure.

If exceptions are identified in any part of the process, loans with exceptions are removed from the purge list. This entire use case would be suspended and ineligible if a blanket hold of any kind is currently in place that applies to the whole Lending system or process.

Baseline requirements for Use Case 4 to succeed are:

1. Use Case 3 has been successfully executed.
2. Each document is tagged with minimum metadata, including unique loan identifier and/or other disposal candidate search criteria.

3. A formal Record Retention Schedule exists, with a retention period for loan documents of ACT+x years.
4. Software exists that can match documents to the paid-loan file and purge those documents from the imaging database.
5. Pre-destruction and post-destruction approval procedures or automated work flows have been developed.

RESULTS:

Documents associated with paid-off loans that have passed their retention period are purged from the imaging system or document repository, leaving only a metadata stub.

Additional notes and observations:

1. Please see Appendix A for more specific requirements and best practices around metadata.
2. This Use Case can be used initially to dispose of legacy content and then placed into routine use for periodic disposal.
3. This Use Case assumes that there is a loan number associated with the image that corresponds to the loan number in the loan application, but that the image system has no other helpful image metadata such as payoff date or legal-hold indicator.
4. Some artifacts of the loan process may remain in applications other than the main loan application. For example, loan origination applications may also retain information. These may not be able to be purged using a file of paid-off loans, as the loan number would not have been assigned yet during the origination process. Situations like this would have to be addressed via a process of systematically applying record retention codes, and resulting retention rules, to each of the financial institution's record-holding applications.
5. Convenience copies of loan documents may also remain in unstructured data sources, where they can be very difficult to identify and dispose.

BEST PRACTICES FOR USE CASES 3 AND 4

1. Metadata stubs and pre- and post-destruction validation and approval documentation become records that must be retained for the period of time specified in the Record Retention Schedule for Records Management or Destruction records.
2. Before beginning a new disposal program, it is important to identify all stakeholders, including Legal, Compliance, Audit, Records and Information Management, the Business Unit(s) and technical support. In your particular institution, there may be additional stakeholders.
3. Before beginning a new disposal program, it is important that event triggers are clearly defined and understood by all stakeholders.
4. It is important to determine if certain records must be retained beyond their designated retention requirement for the purpose of data analytics.
5. The term “paid-off loans” is used in this Use Case because that is the most common scenario. The same Use Case can also be applied to other loans that are eligible for disposal because they have been sold or written off. In these cases, the trigger date would be the date that the loan was sold or finally written off, rather than payoff date. Again, these dates must be defined with clarity and understood by all parties.
6. Work with a Business Systems Analyst with experience in developing detailed Use Cases to develop your own detailed processes and procedures for the disposal. Review with all key stakeholders.
7. Development of detailed pre- and post-destruction validation and approval procedures is critical. Separate validation and approval procedures will be needed for each part of the Use Case. Define clearly who can give the approval for the disposal process to be executed, and who signs off that the disposal process was successful and that the pre-destruction backup can be destroyed.
8. Legal department should review list of individuals who have edit authority to the loan and document systems, as well as others involved in the loan process, against the list of custodians subject to Hold Notices.
9. Define ahead of time how long the pre-destruction backup should be retained. The period of time should be short, similar to how long paper originals are retained after they have been imaged.
10. Test the full disposal process with a test database as many times as needed to ensure that all eligible documents, and **only** eligible documents, are purged so that they cannot be recovered.
11. Test process should include a random-sample validation to verify that triggering event data and document metadata align correctly with document content. The sample size should be meaningful for your institution.
12. Once electronic loan documents have been purged, take steps to ensure that all paper copies and/or retained originals are also destroyed. Give consideration to all copies that may exist, including but not limited to:
 - a. backups and archives
 - b. offsite paper copies
 - c. offsite electronic copies
 - d. hard copies maintained locally by individual employees
 - e. upstream and downstream applications, such as data warehouses

A data map, if available, can be an important resource to identify all copies.
13. Once the disposal process has been completed for the first time and legacy content has been purged, determine the schedule on which the disposal process will be routinely executed to keep the database compliant with your Policy.

CONCLUSION

The difficulty in managing event-based retention rules is a significant contributor to the fact that 78% of organizations cite the biggest impediment to successful IG is a “keep everything culture.” Event-based retention rules contribute to this tendency for inaction. It is important to note that the presence of an internal RIM governance structure can lead to the successful identification and coordination of managing event-based triggers. An investment in RIM staff assigned to business units has been shown to provide the discipline and support that leads to effective management of records and information.

While the solutions detailed in this Guide are perhaps complex and challenging, they can provide a practical approach to the very real problem of destruction inaction and consequent non-compliance with policy. Until a better, more automated, approach becomes available through enhanced technical tools; the solutions outlined here are the best options for improving EBR policy. With consensus amongst key stakeholders and a commitment to consistent practice progress can be made to better manage the life cycle of a significant sub-set of an organization’s information assets.

²Cohasset /ARMA benchmark report Cohasset/ARMA 2013|2014 Information Governance Benchmarking Survey



GLOSSARY OF TERMS:

Active: Records in frequent use, regardless of their date of creation, required for current business relating to the administration or function of the organization. These records are typically referred to on a regular basis to respond to internal and external business requirements and are usually maintained in office space and applications close to hand.

Active Plus / ACT +: A retention rule for which disposition of information is linked to the occurrence of a particular trigger event rather than simply due to the passage of time. Also known as Event-Based and Event Trigger Retention. The “Active” period can be quite long in some instances (e.g., length of employment, length of a mortgage loan, etc.).

Application Programming Interface (API): A set of routines, protocols, and tools for building software applications and enabling data to move between them.

Create Date Retention: A retention rule for which the retention start date begins at the moment of creation or receipt of the record. Also known as Fixed-Based or Fixed Retention.

Destruction: The process of eliminating, purging, erasing or deleting data, records and non-records, beyond any possible reconstruction.

Disposition: The process of deciding what action to take when a record has met its retention requirement and is not on a Legal Hold. Options are destruction, transfer to an archive, or movement to a data analytics repository.

Disposition Start Date: The point in time to begin counting down the required time for retaining the record per the Records Retention Schedule. Also known as Retention Start Date.

Event-Based Record (EBR): An event-based record (EBR) is a record that requires an event to occur to “start the retention clock”. Once the clock starts it is possible to calculate the record’s eligible disposition date. Unlike records with a fixed or time-based retention where the disposition date is calculated based on the date the record was created, an EBR’s event “triggers” the transformation of an actively used record to an inactive, fixed-based retention record based on the date of the event. Also known as Event-Trigger Retention and Active + Retention.

Event Trigger Retention: A retention rule for which disposition of information is linked to the occurrence of a particular trigger event rather than simply due to the passage of time. Also known as Event-Based and Active + Retention.

Fixed Retention: A retention rule for which the retention start date begins at the moment of creation or receipt of the record. Also known as Create Date or Fixed-Based Retention.

Fixed-Based Retention: A retention rule for which the retention start date begins at the moment of creation or receipt of the record. Also known as Create Date Retention and Fixed Retention.

Inactive: Records that are related to closed, completed, or concluded activities. Records become inactive when they are no longer routinely referenced or the trigger event has occurred; the records must still be retained to fulfill legal, regulatory, operational, or other retention requirements.

Indefinite: A retention rule with an undefined time requirement.

Legal Hold: The procedure used to temporarily suspend the normal retention requirements of certain groups of records, even if they are eligible for destruction, due to pending or active litigation.

Metadata: Data describing the context, content, and structure of information to facilitate its management through time.

Permanent: A retention rule used for select records of such importance that they can never be destroyed.

Record: Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.

Records Retention Schedule: A document that identifies and describes an organization's records at a functional or organizational level and provides instructions to assure that records are retained for as long as necessary, based on their operational, financial, and legal requirements or continuing value.

Referential Data Source: Source for determination of occurrence of event.

Retention Rule: The length of time records must be kept for legal, regulatory, operational or other purposes.

Retention Start Date: The point in time to begin counting down the required time for retaining the record per the Records Retention Schedule. Also known as Disposition Start Date.

System of Record (SOR): A system or application within which the "official" record is located. Examples of SORs include electronic content or records management applications, physical records inventory applications/spreadsheets, Human Resources systems and contract management applications.

Trigger event: An event or action that initiates or activates the retention start date of a record.

APPENDIX A: WHAT IS METADATA?

WHAT IS METADATA?

Metadata is literally “data about data.” It describes what content is and what characteristics it possesses. Metadata consists of a property (such as Record Owner) and a value (Employee 1234).

BUSINESS VALUE OF METADATA:

- Organization of information for business needs
- Associate lifecycle rules
- Control access and distribution
- Identify and recommend good content
- Enable accurate retrieval
- Link information into business processes, workflows and enterprise applications
- Enable content analytics and business intelligence
- Enable expertise location

TYPES OF METADATA:

- Descriptive
 - Metadata used for content discovery such as search, sort or navigation.
 - Examples: title, author name, description
- Structural
 - Metadata used to connect content to other content sources or storage locations

- Examples: chapter or section number, shelf number

➤ Administrative

- Metadata used to control access, management or preservation
- Examples: office of primary interest, confidentiality level, expiry date

SOURCES OF METADATA:

- Document specific: keyed by the user
 - Examples: title, description
- User derived: can be automatically generated from login ID
 - Examples: author name, department, job title, email address
- System-generated: Captured by operating system or application
 - Examples: last edit date/time, application ID
- Default data: set by user or group preferences
 - Examples: language, department name, project ID
- Inherited data: from classification scheme into which an item might be saved
 - Examples: security rules, retention rules

GENERAL BEST PRACTICES:

1. The standard should help to ensure the reliability, usability and integrity of the organization's records.
2. A controlled vocabulary is critical so that metadata values are populated consistently.
3. An enterprise-wide, universally adopted metadata standard will only become a reality if all key stakeholders are involved in its development. Stakeholders include, but are not limited to, Records Management, Legal, IT, Compliance, Audit, Privacy, Cyber Security and Enterprise Data Management.
4. The metadata standard must be continuously reviewed and renewed. The standard should be robust and inclusive enough to meet current needs and flexible enough to adjust to future needs.
5. Especially in the early months after implementation, accuracy of metadata should be periodically tested. Test results will help to indicate where metadata captures rules, user training or the standard itself may need to be improved.
6. The standard should be as easy as possible to administer and enforce, and easy for document creators to comply with.
7. The more metadata that can be captured automatically, the better. Document creators will find ways around a burdensome process that requires them to hand-enter multiple metadata elements.
8. Establish universally required metadata elements first. Then identify additional elements that may or may not be required, depending on business unit or record type.
9. Provide for two (2) or more optional metadata elements that particular business units may populate to further classify their content and make it easier to organize and search. These optional elements should not be free-form. Like any other metadata element, they should be clearly defined and documented by the business and subject to a controlled vocabulary, just like required elements.
10. Apply metadata at the higher level and inherit at the document level whenever possible.
11. System rules should specify which, if any, metadata fields may be altered by a document editor.
12. The best time to develop and implement a metadata standard is BEFORE implementing a new records-management or document-management repository. Retrofitting existing data sources to a new metadata standard is extremely difficult, but applying the standard to documents being placed in a new repository stands a better chance of success.
13. If documents that lack required metadata are being migrated to a new repository, consider using data analytics tools to populate as many metadata elements as possible. Document users will embrace the new repository as a single source of truth if good metadata makes it easy for them to find the documents they need.
14. Once the metadata standard is in place, it should be included in functional requirements for all applicable information systems.
15. When electronic documents reach the end of their retention period and are purged, disposal metadata should be captured, and a metadata stub of the document retained as a record, just as a records storage provider maintains historical information on destroyed boxes of paper records.
16. The metadata standard should include specific direction regarding what metadata elements are retained in the stub of a purged document.
17. CAUTION: Any time a document is sent outside your organization, the document metadata and other hidden fields go along with it. A complete treatment of this potential problem is outside the scope of this document, but this should be kept in mind when developing the metadata standard. For example, if the text of a document itself does not include PII, but its metadata does contain PII, that document should be protected as PII.
18. In general, metadata should be frozen (not editable by end users) once a document is declared a record, but it may be editable by administrators in some cases, and should be editable by the system. You may want the system to track additional metadata such as last accessed date, destroyed date, etc. Metadata that is captured or updated after the record is created is called process metadata.

REFERENCES:

There are multiple reference sources for developing a metadata model, including:

- European MoReq standard
- ISO15489
- ISO23081-1
- Dublin Core
- US DoD5015.2
- EDRM.NET XML for electronic discovery interchange
- ISO23950 (Global Information Locator Services)
- GC RMMS (Government of Canada Records Management Metadata Standard)



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Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks and inefficiencies of managing their physical and digital data. Founded in 1951, Iron Mountain manages billions of information assets, including backup and archival data, electronic records, document imaging, business records, secure shredding, and more, for organizations around the world. Visit the company website at www.ironmountain.com for more information.

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