

The Facet



**Diamond
State Chapter**
ARMA International

Educating Delaware's Information and Records Professionals Since 1982

Defining Accountability For Records & Information Management Policy: One Program's Perspective

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Speaker: Rebecca L. Brown, DuPont Company

Presentation: Defining Accountability for Records & Information Management Policy: One Program's Perspective

Date: Tuesday, October 19, 2010

Time: 8:00 AM Breakfast Meeting/Seminar

Location: Christiana Hilton
100 Continental Drive
Newark, Delaware

Cost: \$20.00

Reservations: Please RSVP via e-mail by October 14, 2010

To:

Alicia Reyes Santiago

alicia.reyessantiago@bankofamerica.com

or

At the Diamond State Chapter website at
<http://www.armamar.org/DS/meetingregistrationsc.html>

About Our Speaker

Rebecca L. Brown has twenty-one years of experience in information science, primarily in the research and development sector of DuPont, in a variety of roles, working with a variety of internal businesses, on information retrieval, analysis and information management tools and processes, related to technical projects, regulatory compliance, and litigation. She currently works as a member of the corporate records and information management team responsible for corporate records policy and compliance as a regional program team lead for North America. Rebecca has a Master's Degree in Library and Information Science from Drexel University.

Rebecca will discuss and provide examples of how DuPont applies accountability in relation to the GARP® principles.

President's Message

Valerie L. Singler



Accountability: The quality or state of being accountable; an obligation or willingness to accept responsibility or to account for one's actions. (Merriam-Webster, m-w.com) An organization's health depends upon its records. Like any other business program, to be successful a recordkeeping program must have an Executive sponsor who will provide ongoing support and be responsible for it. The need for this type of support is so important that ARMA International put the Principle of Accountability first in its Generally Accepted Recordkeeping Principles (GARP®). The Boss has to be a "believer."

With Boss' Day this month, our October 19th Breakfast meeting is a great opportunity to introduce our managers and executives to GARP® and the important role they play in it. Rebecca Brown from DuPont will be joining us to discuss the Principle of Accountability and how this principle has been incorporated into their Records Management Program. Rebecca will be sharing her insights and experiences, providing a unique educational opportunity not only for our Chapter but for the people who support (or should support) the work that we are doing on behalf of our organizations. So, think about taking your Boss out for breakfast with a side of GARP® for Boss' day.

The Board has had some additional changes. Jamie Arnold had to resign due to health issues and we wish her all the best. At the same time, the Board is happy to welcome back Wendy Sapp, who is a long-time member and has served the Chapter in a number of capacities throughout the years. Wendy's experience and insights are great assets and we're glad she's part of the team.

The ARMA International 55th Annual Conference & Expo is coming up fast on November 7 – 10th in San Francisco. The sessions this year address practical ways of introducing, implementing and supporting the GARP® program in organizations - from how to educate staff on GARP® and RIM principles to presenting the benefits of a RIM programs and the costs of not supporting it to working with IT, risk management and leading the way. The conference offers a great deal of value to organizations and individual RIM professionals who want to improve their programs and bring them to the next level.

We've heard a lot about accountability over the years. We've seen how the lack of accountability has negatively affected organizations of every size in every industry. As RIM professionals, we need to stand up for and encourage accountability in our programs if we want to support positive growth in our organizations.

**"Accountability breeds response-ability."
Stephen R. Covey**

The Generally Accepted Recordkeeping Principles (GARP®) - The Future has Arrived!

John Montaña of the Pelligroup kicked off the Diamond State's 2010-2011 program by giving an overview of ARMA International's Generally Accepted Recordkeeping Principles, better known as GARP®. John has been on the GARP® development task force since its inception. Along with giving an overview of the Principles, John offered some insights as to their uses and values, as well as a look at where they, and the RIM profession, are headed.

According to John, "The Principles codify existing good practice and for the first time, articulate objective standards upon which the maturity and effectiveness of a RIM program can be judged. They will be an effective tool both for selling the value of sound RIM, and as a tool for working with and improving existing programs."



In the past a lack of credibility with high management has held records management programs back, leading us to ask - how do we gain access and build credibility with executive management in order to obtain the required resources?

GARP® provides eight principles which are very high level descriptions of the attributes of a good records and information management program. They are statements of what a RIM program should be able to do for the organization.

There are a lot of records out there, but they don't necessarily conform to the principles. John offered several examples including Bernie Madoff, AIG, and mortgage derivatives as good bad examples of records management. In these instances, records were not analyzed and compared. In many cases, record sets couldn't be pieced together to get a clear picture of the situation. John offered insight into developing situations such as offshore oil exploration (potential lack of transparency), financial regulation, and mining safety that will bring problems with recordkeeping to light. John further observed that a lack of good management is pervasive.

Good practice should be defined by RIM professionals. Currently, a lot of standard setting is being done by judges, lawyers, bureaucrats, pundits – none of whom are RIM professionals or involved in records management. Judges and lawyers come from a specific point of view, i.e. arguing and deciding a case. How can the GARP® principles help? They are intended to be reasonable, even-handed, objective standards. We currently have no objective criteria to measure against - what is a good vs. bad program. GARP® is intended to provide a standard by which a program can be evaluated.

While the principles are high level and somewhat general, they are supplemented by lower level of materials (commentary), situation specific decisions, and sub-rules that take the standards and turn them into the "real meat." The GARP® Maturity Model is the first step toward internal audit materials that will help identify specific gaps/strengths. Metrics and audit materials are also on the way and John is part of the group working on this project. As GARP® gains acceptance, the program will raise RIM in importance.

John talked about how GARP® talks to executives using their own language to provide an executive summary of RIM and explain how they can be held responsible for compliance to these principles. Why should they care? John noted that there is an active case that is currently examining

the GARP® principles as part of the argument. When a court case arises and GARP® is cited by a judge in an opinion, it will become part of the law and "a lot of people who didn't care last week, will this week." He also cited the case of *Zubulake v. UBS Warburg*, 217 F.R.D. 309 (S.D.N.Y. 2003), which created a splash as it defined requirements around e-discovery and recordkeeping. He also noted that many ANSI & AIIM standards are incorporated into law by reference. GARP® will become an industry standard by which programs will be judged. John said he expects to be called to testify in the not-too-distant future.

Objective standards, metrics for program improvement, and court decisions based on similar standards can be used to make a strong case to management for process improvement and resource allotment. Where does this leave us? John believes in a stronger, more valued and more mission-capable position. It also leaves us on the hot seat to make the case as to whether a program is lousy or great. Once standards are set, a program must comply with them. While a small, simple organization is much different than larger corporations, application of the principles is flexible.

What do we need to do as RIM professionals? John's advice was simple: become GARP-familiar, compliant, and skilled. There is a lot training available on the ARMA International website (www.arma.org) including webinars, the GARP® Overview online training program, articles in the Information Management Journal, etc.

As RIM professionals we need to push our programs forward. In the end, John left us with the following advice - the bar has been raised; we need to rise with it.

Board Report – September 2010



- Two new members have joined the Chapter. Welcome to Janet Mayhew, Ikon and Rachel Buck, Endo Pharmaceuticals.
- The Chapter website now accepts reservations for monthly meetings. PayPal will be added to the website soon.
- The treasurer reported that as of August 31, there was \$5,855.89 in the checking account; \$4,133.89 in the money market fund.
- Wendy Sapp was appointed to the board to fill a vacancy. We welcome Wendy's return to the board and appreciate her service.
- The Board brainstormed about the seminar, tentative date March 24, 2011. It will be held at the Christiana Hilton.
- The October 19 program will feature Rebecca Brown, DuPont Company, who will speak on the GARP principle of Accountability.

Generally Accepted Recordkeeping Principles

PRINCIPLE OF ACCOUNTABILITY

Felix Spitelle

“An organization shall assign a senior executive who will oversee a recordkeeping program and delegate responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure auditability.”

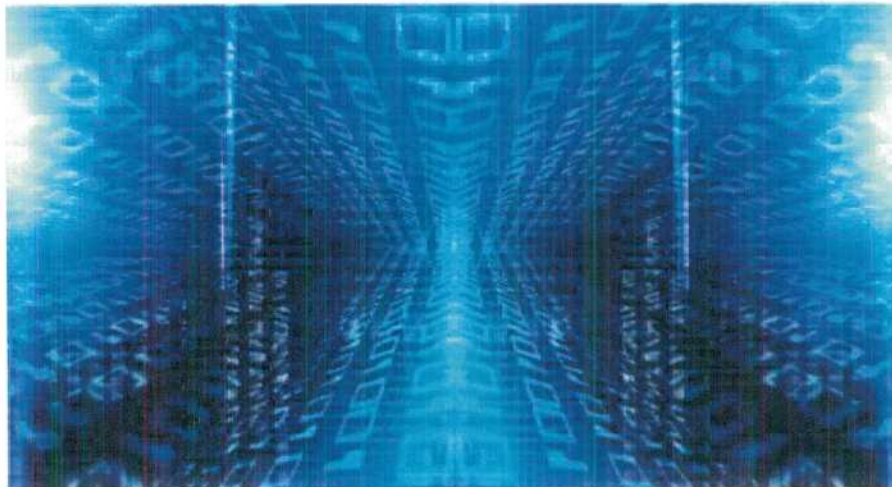
A basic premise to sound recordkeeping is that within each organization, someone is designated as responsible for the overall program. This individual should be in a senior-level position who has access to other senior executives and can ensure program implementation across the organization.

A major responsibility for this executive is program development. As an ongoing program, recordkeeping requires the program to be monitored for compliance and to identify any areas requiring improvement.

Governance should be established through the organization, assigning defined roles and responsibilities to different staff so it is clear where responsibilities reside and how the chain of command works to build, implement, and upgrade the recordkeeping program.

For staff to know how to implement the recordkeeping program, it is essential to have program policies and procedures that are documented, formally approved, and communicated to personnel. Updates to the policy and procedures should be available to staff, as should recordkeeping training.

All of this is designed to further standardize the program across the organization. This standardization enhances staff's efforts to effectively implement the recordkeeping program and auditing the program should verify the status of compliance with these standards.



Library Corner: GARP® The Future Has Arrived

Lynn Catanese



John Montaña, Esq., principal of the PelliGroup, gave the presentation, "The Generally Accepted Recordkeeping Principles: The Future Has Arrived." John has been involved in the establishment of GARP® and is a Diamond State Chapter member. He gave an overview of the Principles, offered insights about their use, and looked at the future of GARP® and the RIM profession.

The following websites have additional information about GARP®:

ARMA
<http://www.arma.org/garp/>

"Special Report: IT's Critical Partnership with Records Management," *CIO Update*
<http://tinyurl.com/2duo4v9>

"FAQ: GARP and how it helps you achieve better information governance," *SearchCompliance.com*
<http://tinyurl.com/2dv23xu>

"Ten Years After, RIM Standards Evolve Slowly," *Positively RIM*
<http://tinyurl.com/24u2jh7>

"The Imperative for Generally Accepted Recordkeeping Principles," *The Free Library*
<http://tinyurl.com/293lbr8>

Mark Your Calendar

Unless noted otherwise, meetings are scheduled for breakfast on the third Tuesday of each month at:

*The Christiana Hilton
100 Continental Drive
Newark, Delaware*

November 16, 2010

8:00 a.m. Breakfast Meeting
Speaker and Topic: To Be Determined

December 21, 2010

8:00 a.m. Breakfast Meeting
Speaker and Topic: To Be Determined

January 18, 2011

8:00 a.m. Breakfast Meeting
Speaker and Topic: Maura Dunn, Consultant of Duff & Phelps will discuss the GARP® Principle of Compliance

February 15, 2011

8:00 a.m. Breakfast Meeting
Speaker and Topic: To Be Determined



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