

It's **GOTTA be 5 O'clock**
somewhere... *Do you know*
what shape *your program* is in?

AMBITIONS REALIZED. MILESTONES ACHIEVED.

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agenda

Auditing your records management program - 101

1. Definition of audit terms
2. Framework
3. Objectives of an audit
 - a. Why audit?
 - b. Determine who, what and how to audit
 - c. Understand current practices
 - d. Identify and assess “at risk” areas
 - e. Mitigate “at risk” areas
 - f. Documentation
4. Survey results (unscientific)



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definitions

Audit

A review of information-related activities to ensure that sufficient policies, procedures, and controls are in place and complied with to meet all operational, legal, and regulatory obligations and to identify where and how improvements should be made.

Audit Trail

A record that allows for a sequence of activities to be reconstructed, reviewed, and examined.

Compliance

The manner and duties in which an organization conducts its activities in accordance with the requirements of applicable internal and external authorities.

Focus

A review of information-related activities to ensure that efficient policies, procedures and controls are in place and compiled to meet all operational, legal and regulatory obligations and to identify where and how improvements should be made.



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Records and Information Management

The field of management responsible for establishing and implementing policies, systems, and procedures to capture, create, access, distribute, use, store, secure, retrieve, and ensure disposition of an organization's records and information.

Records Retention Schedule (RRS)

A comprehensive list of records series documenting for each the length of time it is to be kept, and its appropriate disposition.

Remediation

The act or process of remedying (to correct, or counteract).

Risk Management

The identification, assessment, and prioritization of risks-defined as the effect of uncertainty on objectives, whether positive or negative, followed by coordinated and economical application of resources to minimize, monitor, and control the probability and/or impact of undesired events.

Spoliation

The intentional or unintentional destruction of records that may be relevant to ongoing or anticipated litigation, government investigation, or audit.



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framework



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objectives

Why audit?

- To monitor your organization's compliance with your records management program's policies and procedures
- To look for chances to improve the quality and performance of your records management program, and
- To identify, acknowledge, assess and remediate risk from noncompliance
- ARMA's Generally Accepted Recordkeeping Principles® includes the **Principle of Accountability**, which addresses the need for senior-level management oversight stipulating that practitioners must ensure program auditability.



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Determine who, what and how to audit

Audits will take an inventory of your organization's current records management practices using interviews, sampling, testing, checklists, questionnaires, surveys and observation.

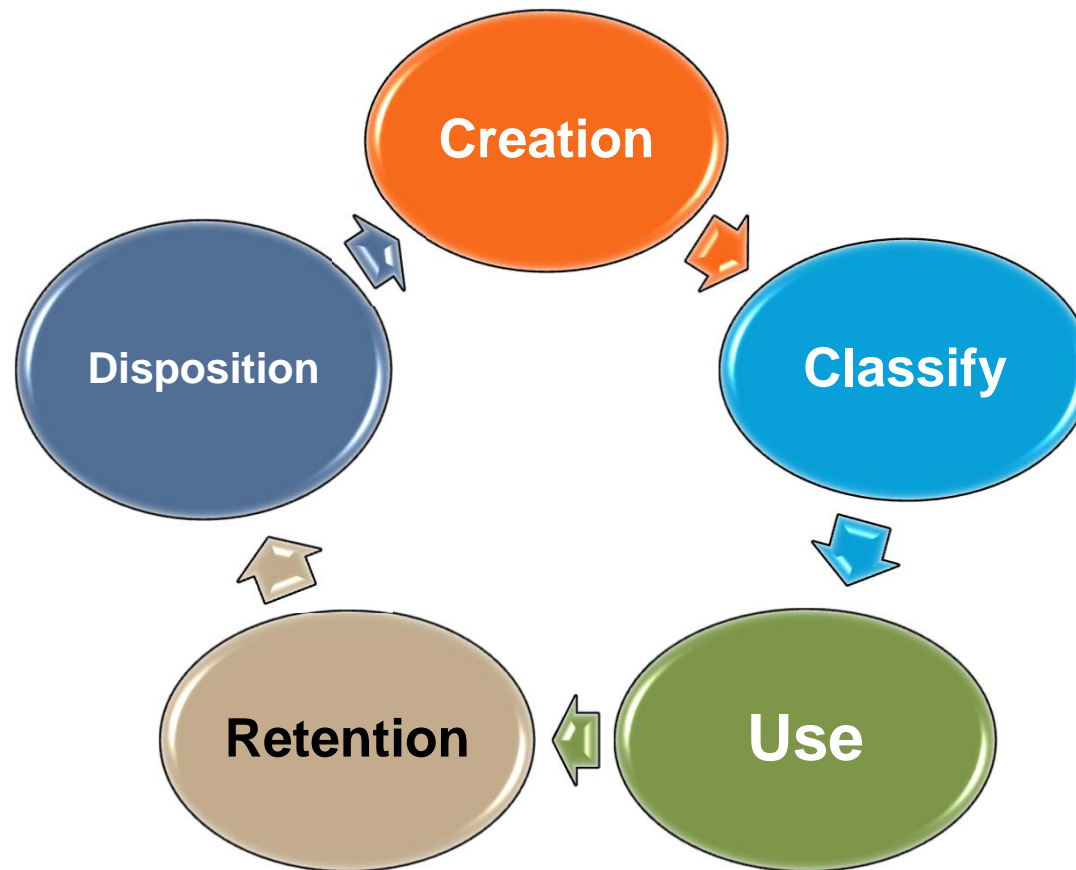
Figuring out where to start, what questions to ask and what aspects to audit can be overwhelming, so ...

- get commitment and support from senior management
- develop a list of objectives and a communications strategy/plan
- determine what tools/resources are to be used to collect audit data; and
- identify two or three “quick wins” to start with and build momentum.



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Keep the records lifecycle in mind...



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Identifying, assessing and mitigating “at risk” areas

Once retention requirements are determined, do a risk assessment to determine the appropriate retention period for each record type.

Retention periods are identified on a records retention schedule-- documented as organizational policy, and approved by senior management.

Retention decision makers must be aware that the presence or absence of information can be helpful or harmful to the organization.

To minimize risks and costs associated with retention, simply implement and follow your records retention schedule consistently.

Principle of Retention



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Remediation—how to fix it!

- Prioritize and select suitable remediation/improvement strategies and processes
- Assign accountability to roles within the organization so success in those strategies and processes is attainable
- Design a way to ensure continuous improvement through routine monitoring, periodic assessments, and additional audits



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Documentation

The ***fact finding sheet*** is used to share audit findings as soon as possible with the auditee during the audit, and should include: Criteria, Condition, Cause, and Effect.

The ***exit meeting's*** objective is to summarize the audit findings and the suggested solutions (recommendations) to fix the issues. Findings discussed should never be a surprise for the auditees, and is the ultimate test for the auditors to make sure they were not mistaken when identifying conditions or when interpreting criteria. Final agreement on how remediation should be reached occurs here, and minutes may be distributed.

The ***audit report*** will be read by a variety of people. It may include an executive summary for senior management and the audit committee, and include both recommendations for remediation to *suggest* how things can improve, and an action sheet with target dates as agreed upon by the auditees.

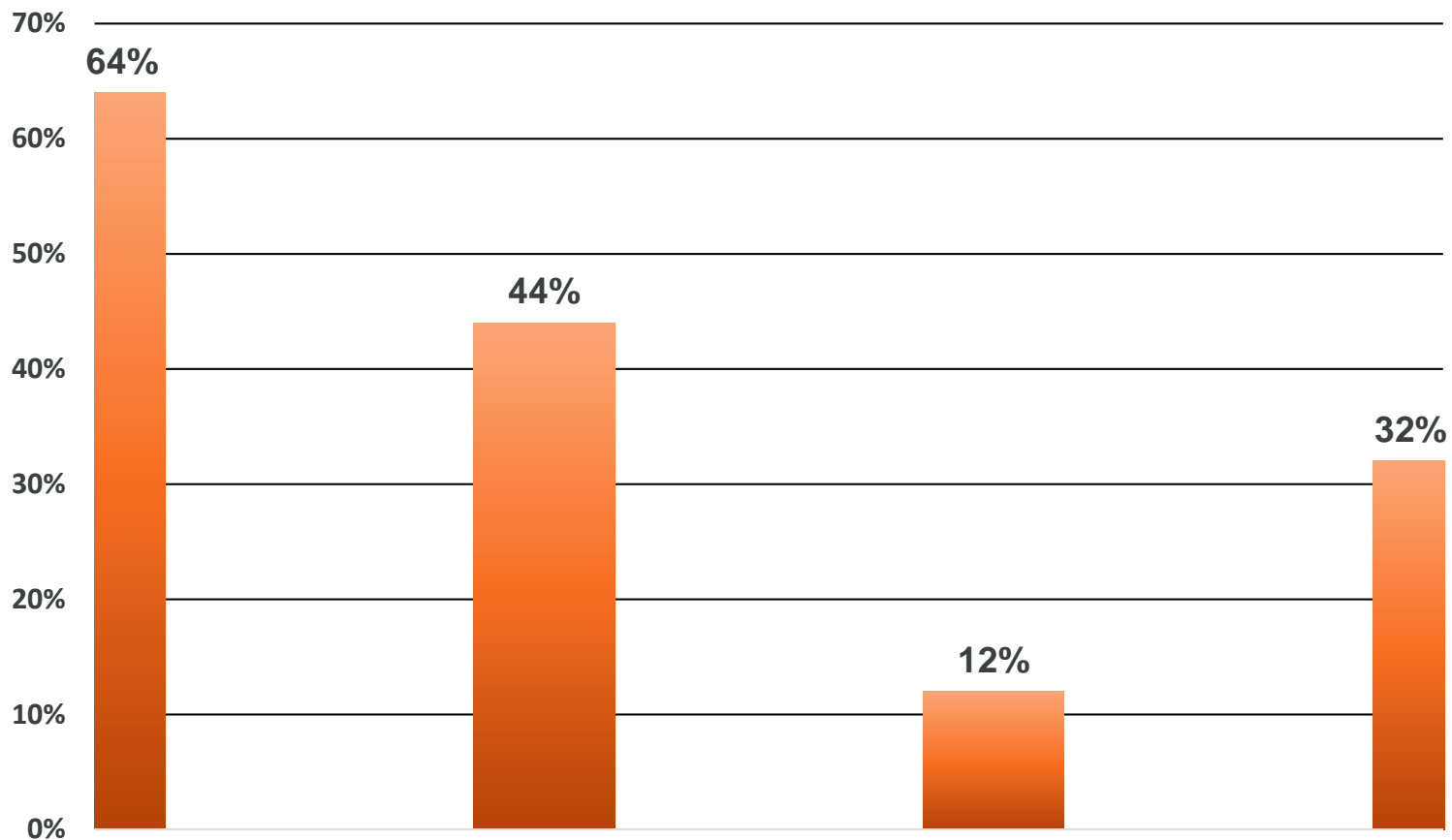
Follow up on remediation efforts of audit recommendations.



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survey results

What media of records do you audit?



Physical records only

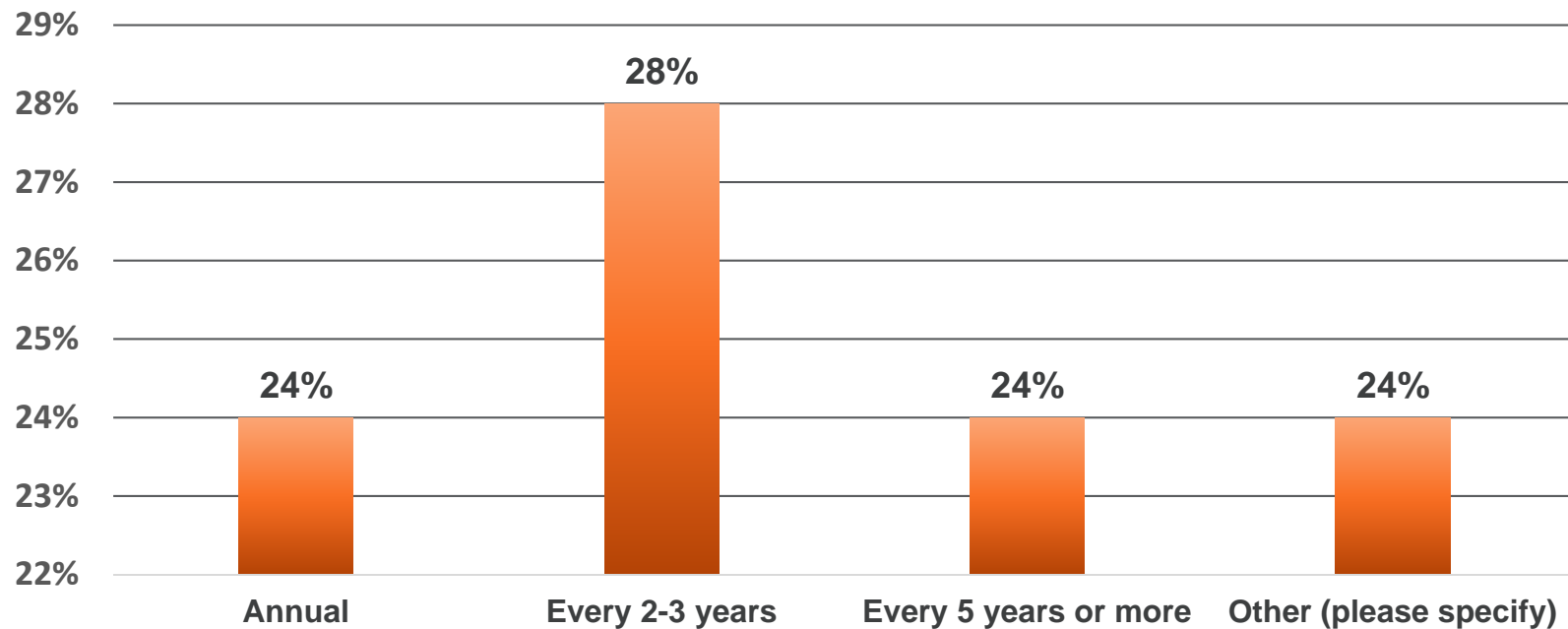
Electronic records only

Microforms

All of the above?

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How often do you audit your records program?



Other responses;

- We have only done one (this January). We hope to do one every year or every other year
- Never
- Not sure, new to this position
- As time permits (so rarely)
- New program, but will do annually



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Do you conduct internal or external (vendors) audits?

- Internal only 64%
- External only 4%
- Both internal and external 32%

Do you use 3rd party or external auditors to audit your records management program?

- Yes 16%
- No 84%

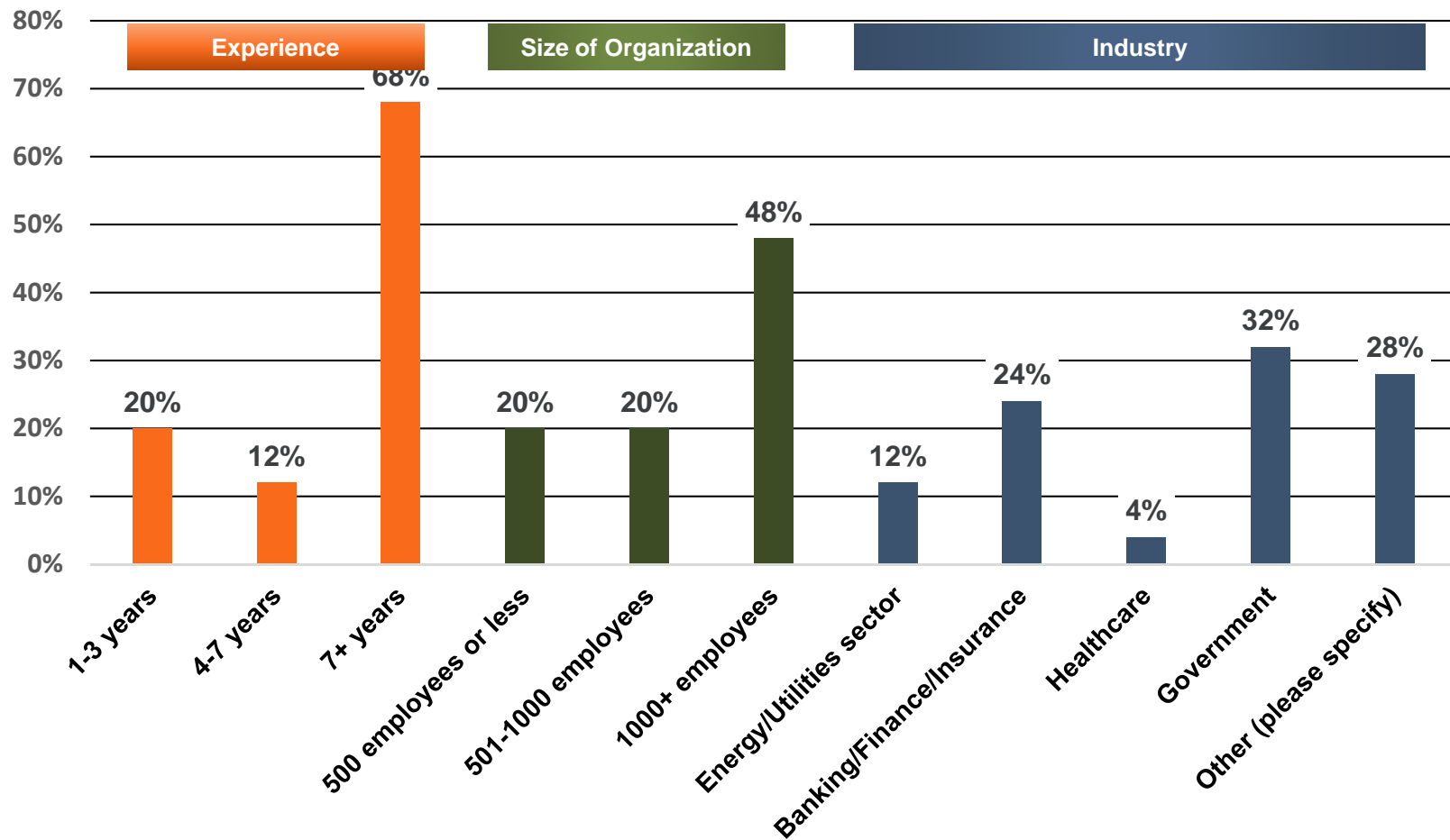
Who reviews the audit results?

- Legal and/or Compliance and/or IT 8%
- Executive management or leadership committee 8%
- Records Management only 40%
- All of the above 28%
- Other (please specify): 16%
 - "We should do this, but don't"
 - "IGC"



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Demographics



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Rate the top 3 areas audited in your program:

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>	<u>5th</u>
- Compliance with records retention schedules	71%	10%	10%	5%	5%
- Offsite storage vendor contract and services	0%	20%	20%	30%	30%
- Scanning/imaging vendor contract and services	10%	20%	40%	10%	20%
- Records destruction processes	21%	48%	22%	4%	4%
- Filing classification systems	6%	28%	50%	11%	6%



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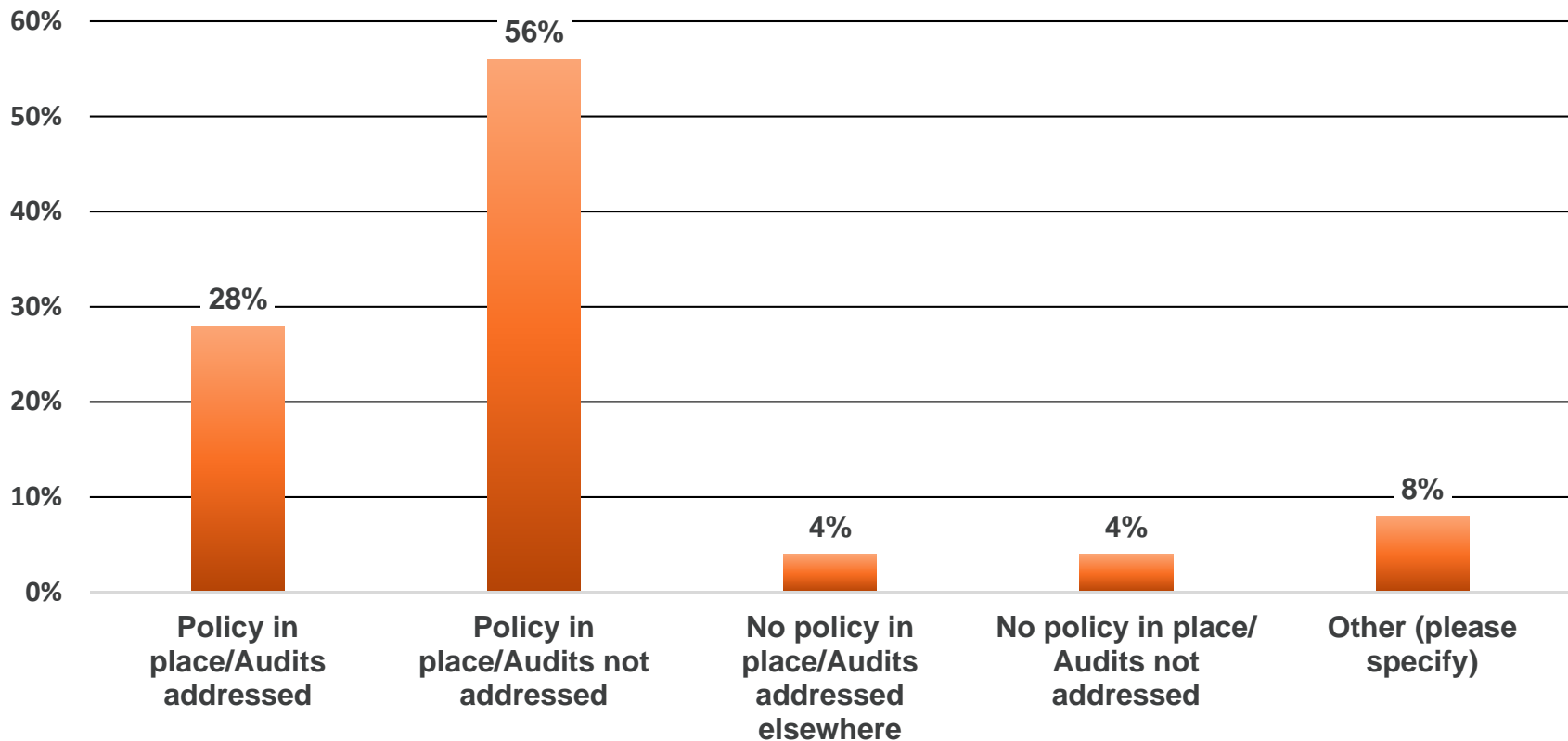
What happens if your customers are not conforming to your records management program?

- i just have to deal with the situation
- Non-conforming customers generally receive remedial training and hands-on guidance for future submittals of materials.
- Internally, advise head of compliance and ask senior management of business unit in question to propose how and when they intend to comply
- Proactive remediation plans are put in place and followed up. Then those aread get a separate validation review post correction.
- We work with employees to understand the policies in place and the risk that the non-compliance poses to the agency and the citizens of the state.
- This is to be determined yet. We hope to sit down with each customer/department that is not conforming to the program and ask for their assistance....
- Phone call - then follow up 2) still have problems = physical visit to department + follow up meeting with dept head; 3) No resolution? My VP sets up a meeting with dept exes; sets firm remediation schedule; lots of follow up and random inspections
- Conduct more training and bring non compliance to the attention of upper management



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Do you have a policy in place--and if so, are audits addressed in it?



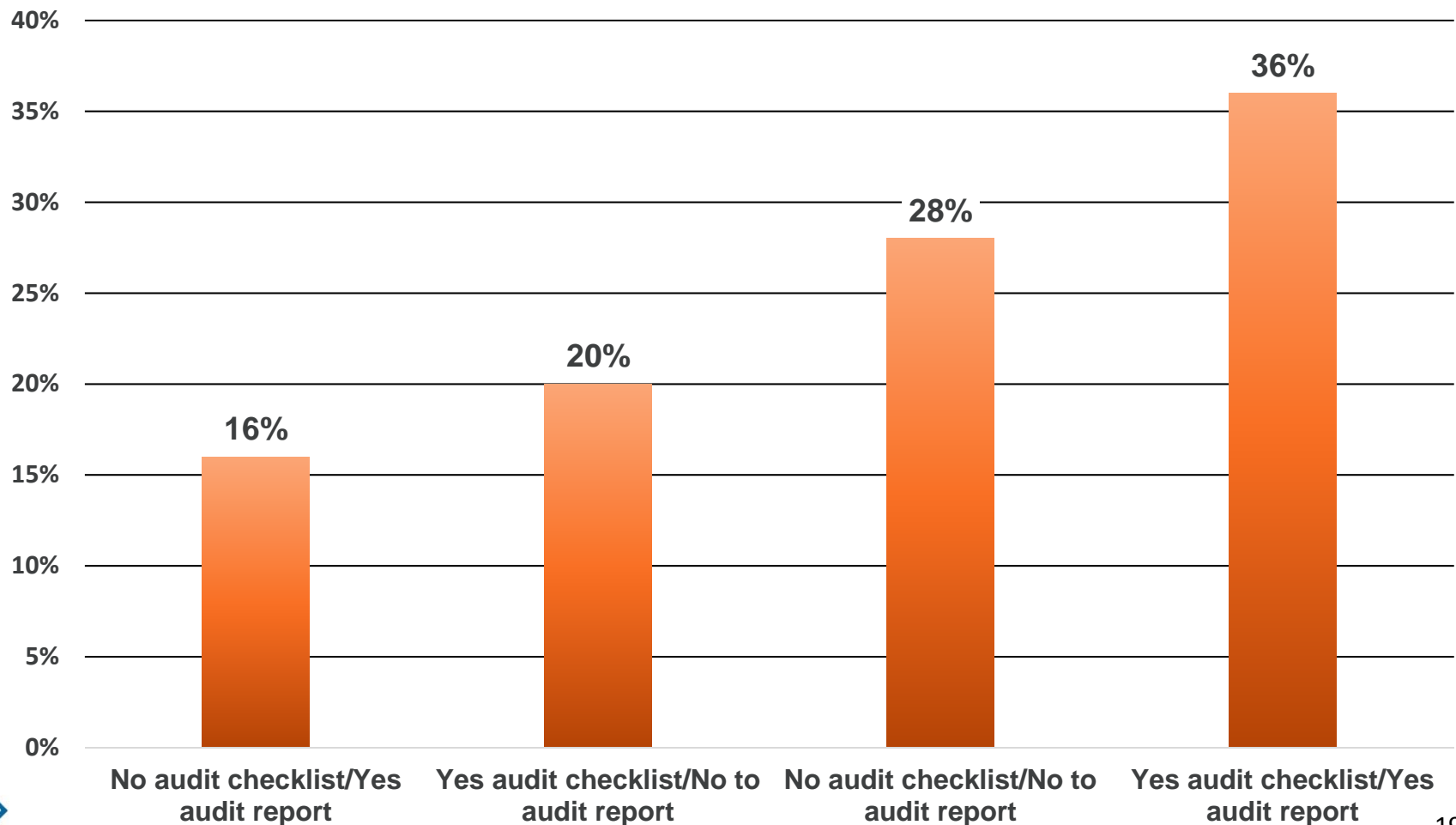
Other responses;

- unwritten records management procedures, but the official policies are in place
- We have a records policy and a stand alone RM audit guidelines document.



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Do you use a records management audit checklist? An audit report?



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Thank you!



QUESTIONS?

