

# Where Do I Begin??!! Retention Policy and Classification: A Primer with a Case Study

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# Agenda



The Information Challenge

EMC Solutions

How to get started

A Case study

# A Complex Conundrum...



## Compliance

- Tens of thousands of regulations worldwide
- A growing global issue

## IT Costs/Time

- Dis-integrated solutions

## Changing Roles and Mandates

- Information Management, Records Management, and eDiscovery colliding

## Securing Corporate Data

- Protecting your information—and your image



# Redefining What You Truly Need



Simple retention management is what most organizations are capable of implementing today

- Majority of organizations have retention rules
- Rules may or may not be implemented across the board

## Two eDiscovery goals

- Reduce costs (storage, management, legal)
- Improve information handling within an organization

## Reduce content...

- Ensure that retention policies are being applied
- Run disposition or deletion consistently

**When retention is implemented and disposition is managed consistently, they lower discovery costs and improve all aspects of information management within an organization**

# Documentum Records Management Solution



## Helping Hundreds of Companies Manage Content Under Compliance

Implement a solution that addresses your specific and unique requirements

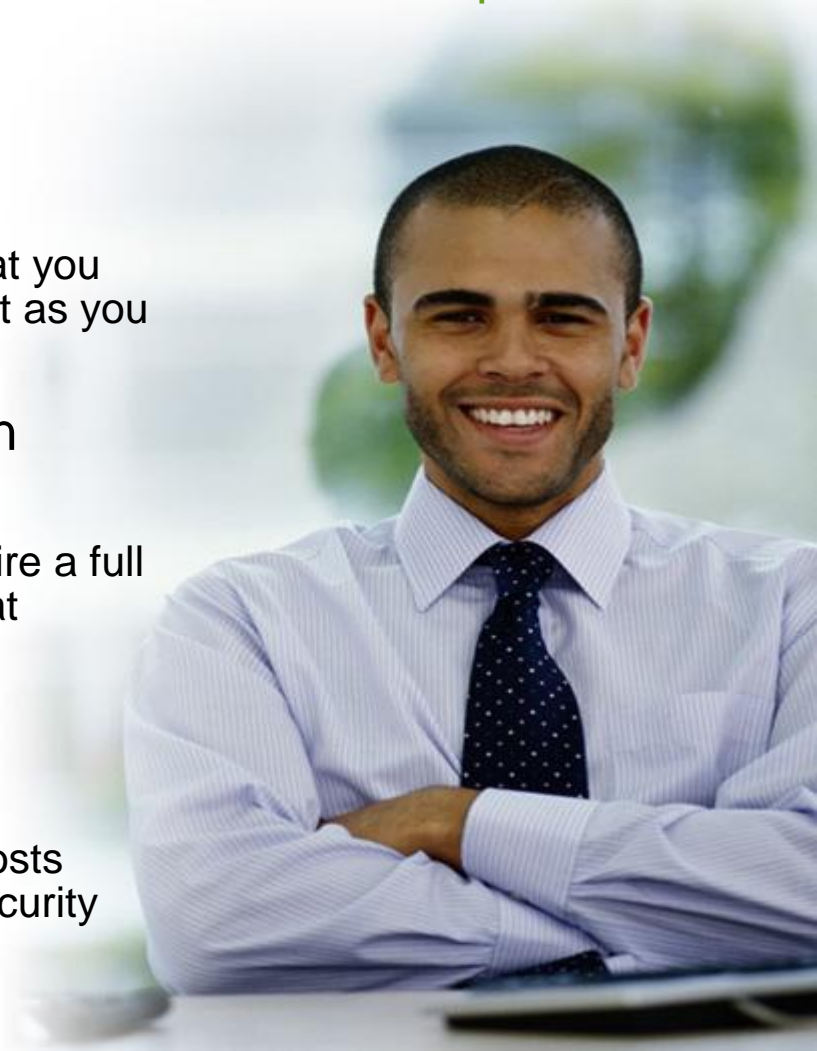
- Documentum’s modular approach to records management allows you to implement only what you need, with the ability to scale up and extend out as you grow

Good governance of corporate information begins with retention and disposition

- The large majority of organizations do not require a full formal solution, but rather require a solution that attaches a “lifecycle” to content

Mitigate risk and cost associated with compliance and litigation

- Lower IT and eDiscovery costs, and mitigate costs aligned with non-compliance, data loss, and security breach



# Retention Policy Services Overview



## Key Points

Helps organizations comply with legal and regulatory requirements

- Apply and enforce retention and disposition policies automatically
- Deploys quickly to begin working immediately
- Alleviates compliance burden on end users
- Provides auto-delete capabilities
- Provides cost savings for storage, compliance, and eDiscovery

Built on the Documentum Platform

- Integrates with Documentum content management applications
- Applies to legacy Documentum content
- Enforces retention policies on external content

Retention Policy Services	Records Manager	Extends Out to
		SharePoint
		EMC Centera
		SourceOne
	<ul style="list-style-type: none"><li>• File plan</li><li>• Security</li><li>• User declare</li><li>• Shredding</li><li>• Paper (basic)</li></ul>	<ul style="list-style-type: none"><li>• File plan</li><li>• Security</li><li>• User declare</li><li>• Shredding</li><li>• Paper (basic)</li></ul>
<ul style="list-style-type: none"><li>• Records</li><li>• Holds</li><li>• Audit trails</li><li>• Notifications</li><li>• Inheritance</li></ul>	<ul style="list-style-type: none"><li>• Records</li><li>• Holds</li><li>• Audit trails</li><li>• Notifications</li><li>• Inheritance</li></ul>	<ul style="list-style-type: none"><li>• Records</li><li>• Holds</li><li>• Audit trails</li><li>• Notifications</li><li>• Inheritance</li></ul>

# Getting Started



# Challenge of Balance



How to develop a common retention implementation that meets all needs

1. Scales AND is repeatable AND cost effective (IT)
2. Meets jurisdictional requirements (Legal)
3. Leverages a detailed file plan that treats content appropriately (Records)



## Questions to Ask



What are the project goals? / What are you trying to do or achieve?

Who has ownership? / Who provides the funding?

Who are the constituents? / Who is affected by this project?

# Who Needs to be Involved



## The Usual Suspects

IT Team

Records managers – do they exist? Do you know who they are?

Business People

Legal / compliance / regulatory – who is this in your organization?

## Other Potential Participants

End users

Other affected business units



## Risk-adjusted Approach to Starting



How to decide what to start with:

- Don't attempt everything at once
- Is there an event: what's burning?
- Who is funding? What do they want to accomplish and when?
- Is it a certain set of records OR
  - Is it a line of business need OR
  - Is it something that can be isolated and can be c end-to-end
- Document the lessons learned from the pro
- Scale across the organization from there



## Recommend a big bucket approach

- File plan for each group or file shares for each line item are expensive and difficult to manage

## Recommend a cross-functional approach

- How do content types roll up
  - Financial
  - Legal
  - Facilities
  - Etc.

## Recommend you manage at the classification level rather than in the details

- Work to get disposition in a timely manner
- Makes Discovery easier
- Take out the garbage ASAP



## Case Study: Fortune 500 Energy Company



### Problem/Goals

- Improve on the management of records for compliance
- Improve on eDiscovery costs
- Improve on business process efficiency

# Case Study: Fortune 500 Energy Company



## Challenge

- Automate the identification and classification of records
- Establish a compliance framework for the entire organization
- Bridge the gap between records, compliance, legal and IT
- Roll out an enterprise corporate records repository, starting with the Environmental business unit
- Update existing out of date retention schedules
- Improve tagging, organization and retention of all content
- Automate code of conduct security (rules of conduct to prevent market manipulation)
- Leverage compliance technology to promote business efficiency as well as compliance
- Work within budget and time constraints



## Solution Overview

- Created a simple Semantic Model of the documents and records created in the course of business (e.g., Lists of data, relationships, usage...)
- Published the model into Documentum RPS
- Automated the identification and classification of records



## Results/ROI

- Improvement on Environmental groups ability to manage electronic records for regulatory compliance
- Improved efficiency for permitting and other business process activities around environmental compliance
- Improved eDiscovery request processing
- Developed compliance framework for rest of enterprise



## Accomplishments

- Worked with subject matter experts from IT, Records/Compliance and Business Units
- Followed a methodology to develop a semantic model of the documents and records created in the course of business
- Published this model into Documentum RPS and used it to automate the classification of records
- Developed a repeatable compliance framework for the Environmental to be used across all other business units.



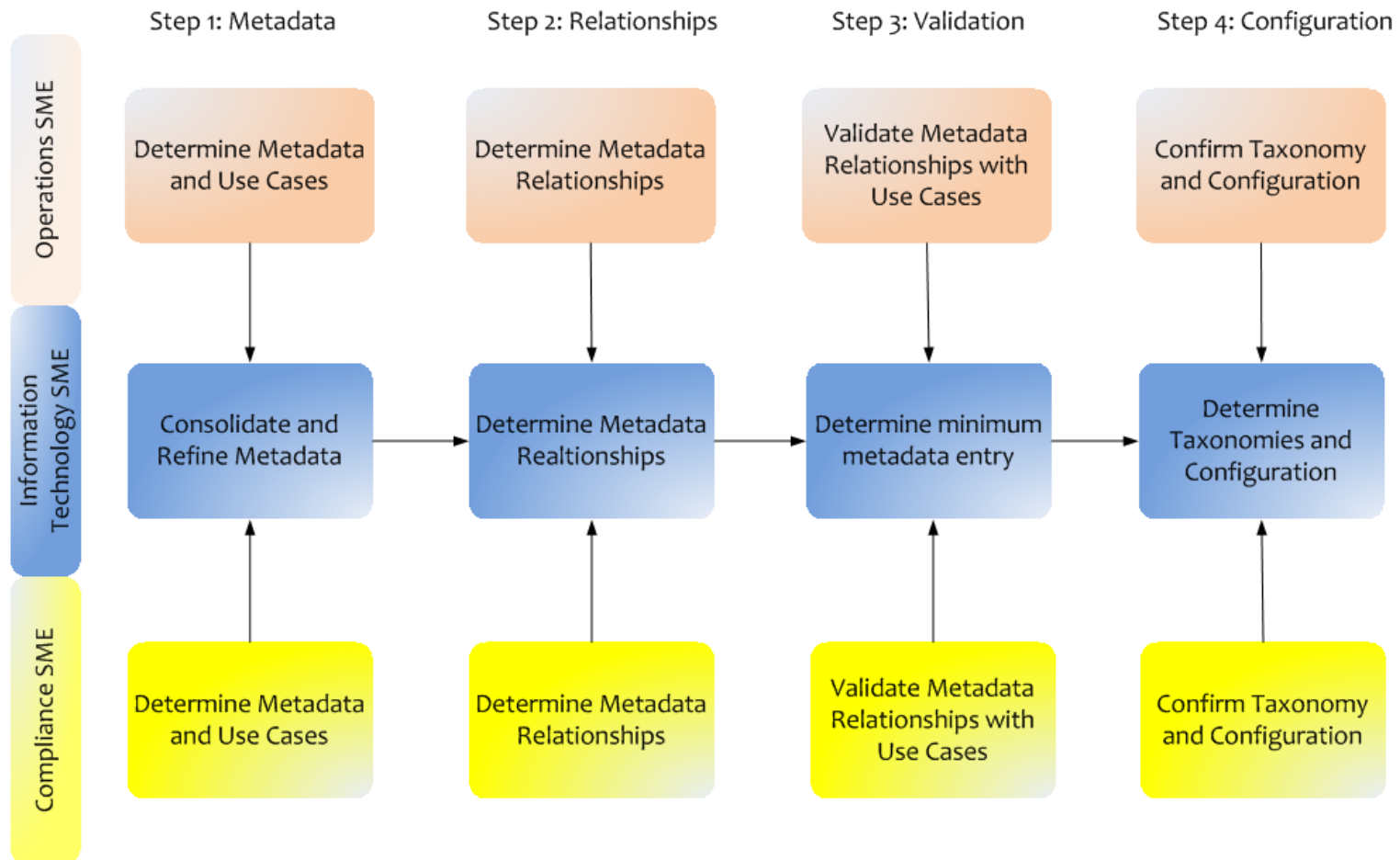
## Environmental Business Unit

- Provide all the permitting and compliance reporting, responding, remediation, etc.. for all environmental issues and regulations
- Have hundreds of facilities across multiple States in the US
- Deal with all aspects of the environment, including air, water, oil, waste, bio/chemical, hazardous waste, etc...
- Have approximately 120 users at HQ with many more distributed across multiple sites and facilities
- Main focus is on permitting for Federal, State and Local
- Regulated by FERC, NRC, EPA and many other regulatory entities

# Case Study: Fortune 500 Energy Company



## Semantic Modeling Made Simple for ECRM



# Case Study: Fortune 500 Energy Company



## Initial Retention Schedule – Considered up to date at the start of project

Type	Record Description	Departmental Retention*	Legal Retention Period/Comments	Legal References
Air	Permits, permit applications, permit determinations, Maximum Achievable Control Technology (MACT) determinations, regulatory authorizations (Title V, Construction, Acid Rain, NOx Budget, Standby Emission Reduction) and supporting documentation and correspondence (e.g., Permit Hearing Request)	Life of Facility	Active permit and application for minimum of 5 years or life of permit	<ul style="list-style-type: none"> <li>• 40 CFR 70.6 (a)(3)(ii)(B) (T5)</li> <li>• 40 CFR 72.9 (f) (AR)</li> <li>• 40 CFR 96.6 (e) (NOx)</li> <li>• 40 CFR 63.10 (b)(3) (MACT)</li> <li>• 40 CFR 51.165 - 166 (NSR/PSD)</li> </ul>
Air	Ambient monitoring	Life of Facility	Permit	<ul style="list-style-type: none"> <li>• Permit</li> </ul>
Air	Initial compliance (e.g., performance, stack) testing data	Life of Facility	Permit	<ul style="list-style-type: none"> <li>• Permit, 40 CFR 60</li> </ul>
Air	CAA Section 114 Request	Life of Facility	N/A	<ul style="list-style-type: none"> <li>• CAA Section 114</li> </ul>
Air	Compliance reports, monitoring, inspection, and notification records for air permits, Title IV CEMS records	10	5 years/3 years (CEMS)	<ul style="list-style-type: none"> <li>• 40 CFR 70.6 (a)(3)(ii)(B) (T5)</li> <li>• 40 CFR 51.165 -.166 (NSR/PSD)</li> <li>• 40 CFR 72.9 (f) (AR)</li> <li>• 40 CFR 96.6 (e) (NOx)</li> <li>• 40 CFR 75.57</li> </ul>
Air	Risk Management Plans and supporting records, correspondence	10	5 years	<ul style="list-style-type: none"> <li>• 40 CFR 68.200</li> </ul>
Air	Climate change (CO2 Program compliance documents, RGGI compliance documents)	10	3 years/10 years	<ul style="list-style-type: none"> <li>• 310 CMR 7.29(7)(d)</li> <li>• 40 CFR 75.73(a)</li> <li>• 310 CMR 7.70(8)(h)(6)</li> <li>• RI ACP Reg 46.10(c)(3)</li> </ul>

# Case Study: Fortune 500 Energy Company



## Initial File Plan/Taxonomy

- 5 levels
- Over 10,000 folders
- Did not include any metadata
- Did not provide any context of the business process
- Did not provide relationship to the retention schedule

<u>Gas Transmission</u>			
	<b>States</b>	<b>Facilities</b>	<b>Envr Programs</b>
	Kentucky		
	Maryland		
	New York		
	Ohio		
	Pennsylvania		
	Virginia		
	West Virginia		
		Stations	
		Pipelines	
		Wells	
		M&R's	
		Other Projects	
		Capital Projects	
			Air
			Active Permits
			Inactive Permits
			Applications
			Compliance Reports
			Gas Samples
			Emission Inventories
			Emission Fees
			Operating Records
			Other Fees
			Trailer Testing
			Portable Testing
			Visible Emissions

# Case Study: Fortune 500 Energy Company



## Step 1: Gather Lists of Metadata

- Changed focus to be metadata first, taxonomy and other configurations second (Includes business and records management needs)

Revised DES Documentum File Structure ver 10-2-2008

**Overview - DES File Structure**

Folder Level File	Attributes					
	Line of Business	State/Fed	Reg/De-reg	Facility Type	Facility Name	Envr Prog
Adm Policies & Procedures	Gas Transmission	List of D states,	Regulated	Station	List of facilities by	316a-Thermal
Agency proceedings	Gas Delivery	Fed	or Non-regulated	Pipeline	Type, Reg/De-Reg,	316b- Intakes
Audits	Gas Cove Point		or Corporate	Well	State, LOB	Acquisitions
Benchmarking/surveys	Electric Transmission			M&R's		Air- General
Budgets/Tracking/Reporting	Electric Delivery			Capital Projects		Air- PSD
Consultants	Electric Power Stations			Other Projects		Air- NSR
Contract & Agreements	Other Company Facilities			Substation		Air Quality
Credit Card	Miscellaneous Envr. Sites			Office		Air- Title V
Enforcement/Consent orders	Envr General Files			Site		Asbestos
Fees/registrations	Administrative Files					Avian
Financial assurance						Bathymetry
General						Benthics
Guidance/Procedures						Biology- Boats
Incidents						Biology-general
Inquiries/Complaints						Biomass
Inspections						BIOS
Insurance						Carbon Seq/captur
Inventories (Emission, etc)						CCB storage/dispo
IT support						CEMS
Lab analyses						Climate Change
Legal/Opinions						Company Vehicles
Legislation- Fed						Compliance System
Legislation- State						Cultural & Historic F
Office Planning						Divestitures
Org charts						Drinking Water
Permit- Applications						Drought

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## Step 1: Gather Use Cases

- Captured top 5-10 use cases

### User Case 1:

File a “North Anna Multi-Media Audit 2008 Draft”

Select Folder: Audits

LOB: Electric Power Stations

State/Fed: Va.

Facility Name: North Anna PS

Env. Program: General

Year: 2008

Life Cycle: Draft

Other attributes auto-populate

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## Step 2: Define Relationships

- For example mapped metadata lists document type, environmental program and facility to retention schedule

Document_Type	environmental_program	Facility	Retention Schedule
Adm Policies & Procedures	*	*	Adm Policies & Procedures
Agency proceedings	*	None	Legal/Agency proceedings
Agency proceedings	*	NOT Facility =' None'	General Environmental
Audits	environmental_program NOT IN ('Superfund','Remediation','Voluntary Rem Prog')	*	Audits
Audits	environmental_program IN ('Superfund','Remediation','Voluntary Rem Prog')	*	Waste/Remediation Site Records
Benchmarking-surveys	*	*	General Environmental
Budgets-Tracking-Reporting	*	*	General Environmental
Consultants	*	*	Consultants
Contracts, Agreements and Purchase Orders	*	*	Supply Chain/Contracts, Agreements and Purchase Orders
Enforcement-Consent orders	environmental_program NOT IN ('Superfund','Remediation','Voluntary Rem Prog')	*	Legal/Agency proceedings
Enforcement-Consent orders	environmental_program IN ('Superfund','Remediation','Voluntary Rem Prog')	*	Waste/Remediation Site Records

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## Step 2: Define Relationships

- During the mapping exercise a new draft retention schedule ready for approval was developed that included many updates to both the business metadata and the existing schedule.

A	B	C	D	E
File Code	Type	Title	Record Description	Departmental Retention
ENV0100	Air	Air permits	Permits, permit applications, permit determinations, Maximum Achievable Control Technology (MACT) determinations, regulatory authorizations (Title V, Construction, Acid Rain, NOx Budget, Standby Emission Reduction) and supporting documentation and correspondence (e.g., Permit Hearing Request). Ambient monitoring. Initial compliance (e.g., performance, stack) testing data. FAA notification.	<b>Life of facility</b>
ENV0200	Air	CFC inventory, inspection, maintenance	CFC inventory, inspection, maintenance	<b>3 yrs</b>
ENV0300	Air	Risk Management Plans	Risk Management Plans and supporting records, correspondence	<b>10 yrs</b>
ENV0400	BIO/Chem	Avian	Avian permits, Avian permit applications, supporting documents, and incident reporting forms	<b>Life of facility</b>
ENV0500	BIO/Chem	Laboratory records and process control samples	Laboratory records, including lab certification and TCLP/Used Oil, Groundwater field data and lab data, NPDES/VPDES, General Samples. Process control samples. Hazardous waste analyses, test, and other determinations.	<b>5 yrs</b>
ENV0600	BIO/Chem	Nuclear, including diesel fuel results	Nuclear, including diesel fuel results (Jim to change desc)	<b>Life of facility</b>

## Step 3: Validation

- Run metadata and relationships through use cases to determine the minimal data entry with enough data being captured to support both business and compliance

### Use Case 2:

File “10/25/2008 Oil Spill Report from Ox Substation”

1. Select Document type: Incidents/Release/Spills
2. LOB: Electric Transmission
3. State/Fed: Va.
4. Facility Name: Ox Substation
5. Environmental Program: Oil- AST-UST
6. Year: 2008

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## Step 3: Validation

- Three mandatory metadata choices and the rest can be auto-populated

Attribute	Automatic	Derived/chosen from or default value
File Name	Yes	10/25/2008 Oil Spill Report from Ox Substation.doc
Title	Yes	10/25/2008 Oil Spill Report from Ox Substation.doc
Document Type*	No	Incidents-Release-Spills from list
Environmental Program*	No	Oil- AST-UST from list
Business Area	No	DOMINION TRANSMISSION from List
Facility Name*	No	Ox M&R Station (Possum Point Tap) from auto-complete list filtered by LOB from Business Area
Line of Business (LOB)	Yes	Gas Transmission from Business Area
Code of Conduct	Yes	2, 6 from LOB
State/Fed	Yes	VA from Facility Name
Facility Type	Yes	Measurement & Regulation From Facility Name
Record?	Yes	Checkbox default = False
Active Year	No	System year, change to 2008
Date Shown on Document?	Yes	System date (Where would this be on the doc?)
Document Entry Date	Yes	System date
Lifecycle State	Yes	Default of Draft
Document Author	Yes	Documentum id
Last Modified Date	Yes	System date
Organizational Unit	Yes?	Environmental from object type dom_environmental
Company	Yes	DOM TRANSMISSION, INC. from Business Area

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## Step 3: Validation

- Auto-classification is driven off the two choices in this use case being document type = “Incidents-Release-Spills” and environmental program = “Oil-AST-UST”, which together map to the Retention Schedule titled “Compliance reporting and supporting document”

Document_Type	environmental_program	Facility	Retention Schedule
Incidents-Releases-Spills	environmental_program = 'Oil- AST-UST'	*	AST & UST

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## Step 3: Validation

- The benefit of this approach is that all the business users are very familiar with the business metadata choices for document type and environmental program, which they want to choose anyway for supporting their business process.
- If you asked the user to choose the appropriate Retention Schedule classification, not only is that one more choice to slow them down, but they may have incorrectly picked “Incidents-Releases-Spills” which is for other incidents, spills and releases outside of AST & UST.

Type	Title	Record Description	Departmental Retention
Environmental	Incidents-Releases-Spills	Incidents-Releases-Spills with descrip - Any but (Bio/Chem or Oil or Waste/CERCLA or PCB or EPCRA-Emergency... or Oil - AST - UST)	Life of Facility

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## Step 4: Configuration

- Now that metadata and relationships are well understood along with the context of business and compliance needs, it becomes a much easier exercise to choose a configuration for Documentum RPS and automate

### Business Taxonomy

Cabinet	Folder_1
Environmental	
	Adm Policies & Procedures
	Agency proceedings
	Allowance auctions-trading
	Assessments (technoligcal and new site)
	Audits
	Benchmarking-surveys
	Budgets-Tracking-Reporting

### Record File Plan

Cabinet	Folder_L1	Folder_L2
Records		
	Environmental	
		Adm Policies & Procedures
		Audits
		Compliance reporting and supporting documents
		Consultants
		Fees
		Financial assurance

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## Results

- The business taxonomy was decided by the business to be two levels, a cabinet for Environmental and then document type. Reducing the number of folders from more than 10,000 to 53.
- The retention schedule that was created previously by traditional methods required updating.
- The solution use the minimal amount of metadata and effort (i.e., auto-populated properties and filtered lists) to capture a document, move it to its appropriate folder in the business taxonomy, apply the appropriate Code of Conduct security and link to the appropriate retention schedule classification, all automatically.

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## Summary

- Implemented best practices for minimizing metadata entry (1-3) metadata choices
- Implemented a framework consisting of a scalable Documentum RPS repository
- Updated retention schedules at the same time as capturing the business requirements for improving business efficiency
- Built a repeatable semantic modeling process for all business units
- and template that can be published directly into Documentum RPS
- Implemented solution in multiple phases in order to meet tight deadlines
- Implemented a consistent repeatable method for identifying and classifying records
- Captured the domain knowledge of the Environmental group in a reusable semantic model in order to potentially share this knowledge across other systems (e.g., SharePoint), mapping business data to Energy regulations.

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## Demonstration

- Semantic model walk through
- Automated configuration of Documentum RPS
- Automated record identification and classification

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