

Streamlining Retention Schedules: The Benefits of “Big Buckets”

TABLE OF CONTENTS

Abstract	2
Definition of Terms	2
Introduction	2
Iron Mountain Exploratory Survey	3
Survey Methodology and Results	3
Survey Summary	5
Cohasset ARMA AIIM Electronic Records Management Survey	6
Survey Summary	6
Case Studies	8
U.S. Government Accountability Office	8
U.S. Patent and Trademark Office	9
Cargill Incorporated	9
Freddie Mac	10
Big Bucket Theory and Electronic Records Management Solutions	10
Technology Perspective Summary	12
Will “Big Buckets” Work in Your Organization?	12
Conclusion	13
About the Authors	14
Resource List	14
References	15

ABSTRACT

This paper describes an approach for streamlining retention schedules in a manner that enhances the usability of electronic content management (ECM) and other recordkeeping systems, while simplifying deployment strategies and optimizing user adoption. It presents best practices identified through the results of two surveys on this topic, and highlights several real-world case studies. Also discussed are issues and opportunities in the area of change management, as well as relevant perspectives shared by ECM technology experts.

This paper will be of interest to professionals in the records management (RM) and information systems and technology disciplines responsible for researching emerging content management strategies and promoting RM best practices.

DEFINITION OF TERMS

Retention schedule: A formal business policy that identifies and describes records and indicates the length of time records must be retained based on their legal, operational, and historical value. Sometimes called a file plan.

Retention category: Records are assigned to retention categories, also known as “buckets,” because they are related to the same or similar business processes, are subject to the same or similar legal requirements, and will be placed under organizational control and stored for the same amount of time. Often called record series or record classes, retention categories usually are applied retrospectively to categorize records for final disposition.

Crosswalk: A chart or table indicating the relationship between two systems, tables, or data structures; for example, a crosswalk from retention categories in a predecessor retention schedule to a new one.

INTRODUCTION

Records retention schedules provide a structure within which retention periods can be applied to a broad range of official information assets to ensure legal compliance, promote consistency, reduce discovery and storage costs, and mitigate the risks associated with keeping records too long or not long enough. A significant challenge with retention schedules relates to classification; i.e., when the number of options to choose from when assigning records to a retention category is large, record creators find it difficult to make appropriate and consistent selections. In the field of cognitive science there is compelling evidence that more choices do not necessarily lead to better decisions. For example:

“...the growth of options and opportunities for choice has three, unrelated, unfortunate effects. It means that decisions require more effort. It makes mistakes more likely. It makes the psychological consequences of mistakes more severe.”¹

When this logic is applied to retention schedules, having a large number of retention categories may mean that many records are classified incorrectly or not classified at all.

In the 1960's and 1970's, most organizations developed retention schedules based on their departmental structure, resulting in hundreds or even thousands of retention categories and frequent duplication of categories between corporate departments and business units. Businesses that still operate with some version of these outmoded classification schemes find them increasingly problematic as the volume of electronic records soars and new types of records proliferate.

In the 1980's, the concept of a *functional records retention schedule* was introduced. Broader classification schemes represented the records created as part of business processes and functions regardless of departmental ownership.²

The *ISO 15489 Standard on Information and Documentation-Records Management* adopted the functional model in 2001. It recommends a structured, multi-level approach to defining retention categories in which the first level reflects the business function, the second level is based on the activities constituting the function, and the third and

subsequent levels are further refinements or groups of transactions that take place within each activity.³ In wide use today, the functional model of retention scheduling can eliminate duplication and reduce the number of retention categories significantly.

However, organizations representing a wide range of industries reflecting experience in implementing retention schedules in ECM and other recordkeeping systems, report that even streamlined schedules based on the functional model (comprising 200 to 300 categories, for example) may still be too complex when end users or automated systems need to classify records at the time of creation or receipt. “Big Bucket Theory” asserts that using significantly fewer retention categories or “buckets” improves a user’s or system’s ability to accurately and consistently apply retention policy to records. In turn, this reduces the risks and costs associated with keeping information assets too long or not long enough.

The U.S. National Archives and Records Administration (NARA) is credited with being an early adopter of the big bucket approach for streamlining traditional retention schedules. Referred to as “flexible scheduling” in 2003, it promoted flexibility in defining record groupings comprised of multiple records series into large aggregated schedules. NARA also envisioned that the process of reviewing and approving retention schedules could be streamlined in this way, resulting in shorter turnaround time for review and approval, and hence quicker deployment.

In its 2004 strategic goals, NARA made reference to big bucket scheduling:

“...big buckets or large aggregations is an application of disposition instructions against a body of records grouped at a level of aggregation greater than the traditional file series or electronic system that can be along a specific program area, functional line, or business process.”⁴

IRON MOUNTAIN EXPLORATORY SURVEY

As hands-on specialists in compliant records management practices, Iron Mountain and Cohasset Associates are well aware of the escalating concerns that many companies face regarding their retention schedules. Interactions with clients struggling to apply retention policy consistently across media types and, increasingly in structured and unstructured digital environments, led Iron Mountain to undertake an exploratory survey in early 2007 to investigate solutions to this all-too-common challenge.

The survey sought to explore whether having fewer retention categories or “buckets” improves a record creator’s ability to accurately and consistently apply retention to documents to a degree that mitigated retention-related risks and/or helped minimize the costs of over-retention. Impacts of the increasing use of classification and storage technologies on retention categories were also focus areas of the survey.

SURVEY METHODOLOGY AND RESULTS

In January 2007, Iron Mountain emailed survey questions to 63 subject matter experts with broad experience in records and information management across multiple industries to ask for their help in determining the benefits—if any—of applying Big Bucket Theory principles to records retention schedules. Fourteen (22%) of the responses were returned and tabulated. Among respondents, six (43%) are ARMA Fellows, four (29%) are Certified Records Managers (CRMs), and two (14%) have PhDs. The survey questions and overviews of trends in responses follow.

Question 1: *In relation to records retention schedules, what do the terms “big buckets” or “big bucket theory” mean to you?*

In general, respondents agreed that the term “big buckets” refers to the creation of broad categories of records based on commonality of retention periods, legal obligations, and record content. Most thought that fewer retention buckets improve an end user’s ability to apply retention requirements to documents accurately and consistently.

Question 2: *When did you first hear about creating bigger buckets in retention schedules? Who used the term first?*

A search of the Dialog online information system by students of Dr. William Saffady at Long Island University produced the first mention of “big buckets” in a 2002 article about installing and testing a records management application at NARA in 2000-2001:

“After the system went live, it soon became evident that filing into a large number of small buckets was extremely cumbersome, significantly affecting the rate of compliance. The file plan was then revised to reduce the number of buckets and make them more general in nature—few big buckets versus many small buckets.”⁵

Question 3: *In your opinion, what are the most compelling reasons to apply Big Bucket Theory to retention schedules?*

According to survey respondents, bigger buckets and fewer choices may lead to better record retention classification. Half of the respondents said that bigger buckets improve an end user’s ability to apply retention to documents accurately and consistently. A majority (71%) thought bigger buckets make it easier for users to learn how to classify documents to their appropriate retention categories. In addition to simplifying training, a streamlined schedule is easier to implement and easier to maintain, thus reducing the total cost of program ownership.

Survey participants expressed interest in making retention schedules compatible with process-oriented Enterprise Resource Planning (ERP) systems such as SAP and Oracle. For some, bigger retention buckets are a requirement when implementing ERP. According to one participant in the exploratory survey, “The most compelling reason I see pertains to the application of retention to electronic records, where you really can’t divide up large database platforms into small granular classes with different retention periods. You need large default classes where all the records can be classified and retained uniformly. In my experience, once you create large, default classes, people will use them because they are so much easier to use than smaller classes.”

As automatic classification of records for retention and retrieval becomes more commonplace, bigger retention buckets will also be more standardized, because automatic classification and rules-based engines require that ambiguity across retention categories be eliminated. According to one respondent of this survey, “There is no doubt in my mind that making the buckets bigger, thereby reducing the number of record categories will make ‘auto-classification’ easier—and this is critical for electronic records that may be created or received in volumes far too large for manual classification.”

Question 4: *Do you have any reservations or concerns about reducing the number of retention categories to increase filing accuracy and compliance?*

Multiple respondents mentioned that before applying Big Bucket Theory to retention schedules, an organization needs to weigh the improved odds that end users will properly classify records against the risks of retaining records longer than necessary. This latter concern is due to the potential need to “round up” to the longest period of any record in the new “bucket,” in order to ensure compliance, when consolidating record categories with different periods. The risks of extending retention periods include leaving more records available for discovery and potentially increased storage costs. These risks are unique to each organization and are based on its history of litigation and regulatory scrutiny, culture for risk tolerance, and resource constraints. However, in many cases, the larger buckets would actually result in the same retention period since the expanded set of records placed in the buckets would be of a comparable “order of importance.”

Another concern mentioned was the potential difficulty in consolidating, along with retention categories, the event-based “triggers” that start the retention clock ticking towards final disposition:

“Event-based records further complicate reducing the number of buckets because even where records have some functional relationship and maybe even the same post-event retention period, the “event” that triggers final retention may differ, making it much more challenging to “consolidate” event-based record categories.”

Donald S Skupsky, JD, CRM does not advocate ultra-long retention periods as a substitute for event-driven retention periods. But, he says, “I would accept positions such as: 1) all contracts are 3 years or less, or 2) automatic detection of events (when someone terminates) or 3) estimating the event, and then hold the retention when the user knows the event did not occur.”⁶ Skupsky also is concerned that bigger buckets reduce the precision of classification for search and retrieval purposes. He adds, “While you might improve assignment of retention, you end up providing less specificity in the classification. Thus, you may need to add additional index fields for searching.”

EXAMPLE: THE CHALLENGE OF RATIONALIZING RETENTION TRIGGERS

Consider three hypothetical retention categories (Investment Management, External Financing, and Customer Credit) with the same retention period (Active + 6 years), which are usually supported by the *same* legal requirements. Say the organization uses three *different* retention triggers: Retain for the life of 1) the investment account, 2) the financing efforts, and 3) the customer relationship, respectively. Though not impossible, it would be challenging to find a single, easy-to-apply event trigger that would allow analogous retention categories to be consolidated into the same bucket.

SURVEY SUMMARY

To summarize the results of the Iron Mountain Exploratory Survey, most respondents believe that reducing the number of retention categories in retention schedules can have far-reaching benefits—from making it easier to train users and easier to classify records for retention purposes to facilitating recordkeeping operations such as legal holds, discovery, and records destruction. Not everyone agrees, however, and organizations will need to weigh the increased odds of end users and system administrators properly classifying records against the potential risks of retaining records longer than necessary.

Not all survey respondents thought that big buckets were a solution for contemporary records management. Although in the minority among survey respondents, the contrarian point of view on bigger buckets came from a respondent who thought it was appropriate to use Big Bucket Theory to facilitate implementation of ECM. Beyond that, however, this same survey participant adds: “The theory lends itself to truly ‘watering down’ the importance of good records retention policy and every value records managers have tried to instill over the last five decades!”

Overall, most respondents indicate that if end users could more consistently, confidently, and accurately apply broader retention categories to records, the result would be more records disposed of rather than fewer. The logic is that confident end users are more likely to classify records accurately and consistently; therefore, disposition authorities are more likely to approve records for destruction based on less granular retention categories. More testing and research needs to be done to test these suppositions.

COHASSET ARMA AIIM ELECTRONIC RECORDS MANAGEMENT SURVEY

In May 2007, the bi-annual Cohasset ARMA AIIM Electronic Records Survey was conducted via the Internet.⁷ Members of ARMA and AIIM were invited to participate in the survey in a special e-mail message from their respective association staff leaders. All previous Managing Electronic Records (MER) conference registrants and members of the Records Management LISTSERV were also invited to participate.

The collective size of the four groups invited to participate was approximately 17,000 individuals. Many of these same records and information management professionals also have attended the MER conference over its fifteen-year run. Accordingly, the total number of unique potential respondents was estimated to be between 10,000 to 11,000 participants. Based on this estimate, the number of survey respondents (1,596) was approximately 15-16%—a rate that reflects a keen interest in the topic and underscores the need to better understand the current state of electronic records management performance.

SURVEY SUMMARY

According to the survey findings, more than half (57%) of the survey respondents had less than 250 record series/retention categories. In response to the question, “How many different record series does your current retention schedule have?” nearly one-third had less than 100 record series/retention categories (see Figure 1):

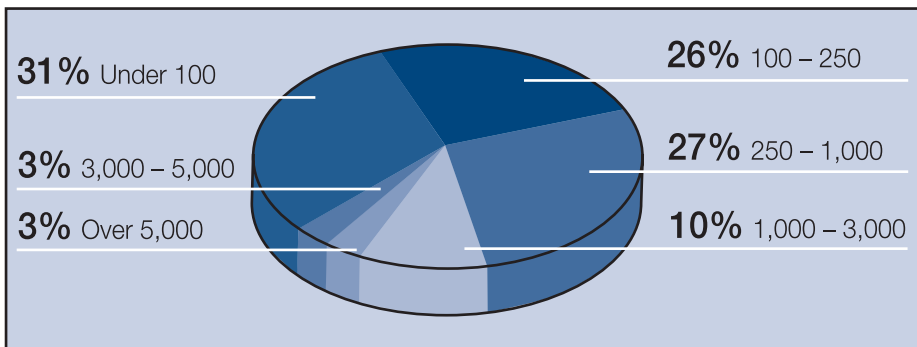


Figure 1: Number of retention categories among Cohasset ARMA AIIM survey respondents

Respondents were also asked, “Given the growing capabilities to search vast volumes of electronic records, do you believe the “big bucket approach” (i.e. significantly fewer records categories containing a broader spectrum of current record series) is the best way to meet the challenge of classifying large daily volumes of electronic records?” By a ratio of nearly two-to-one, respondents agreed that the “big bucket approach” is the best way to deal with classifying large volumes of electronic records to retention schedules (see Figure 2):

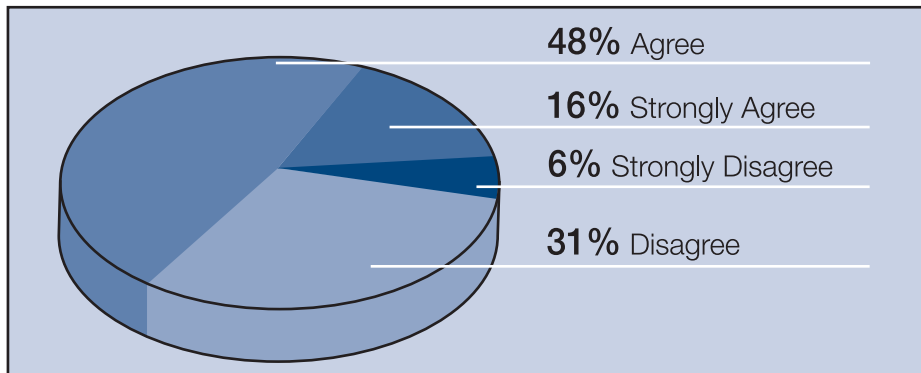


Figure 2: Perceived viability of “big buckets” for classifying eRecords

In response to the question, “Do you believe your organization currently has more record series than are practicable for effective management of its electronic records,” less than half the respondents (40%) expressed the view that their organization had too many retention categories. However, it is not known to what extent electronic recordkeeping systems have been deployed in respondents’ organizations to automate the categorization of records for retention purposes (see Figure 3):

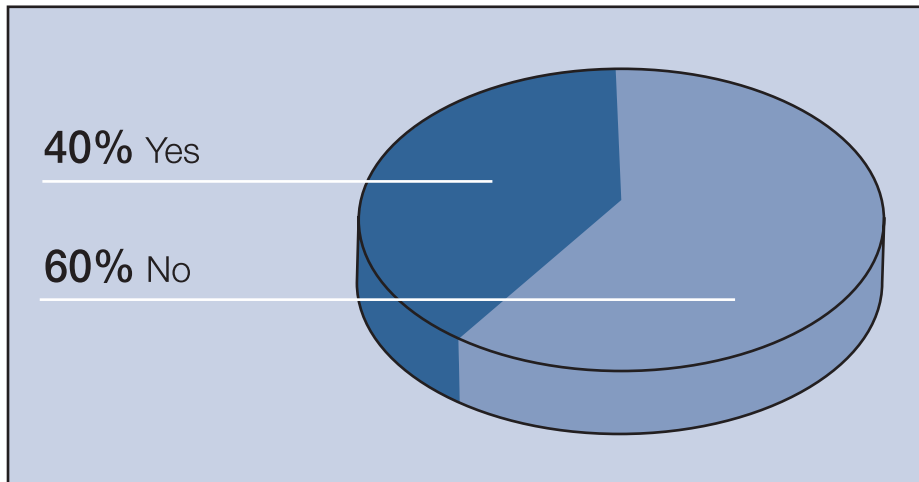


Figure 3: Perceived practicality of current number of record series

The 2007 survey was the first instance in which these three questions about the number of record series/retention categories and their role in electronic records management were administered. These preliminary survey results suggest that many organizations have already adopted retention schedules with aggregated retention categories because they believe it is a viable way to meet the challenge of classifying large volumes of electronic records. The responses should be viewed, however, within the broader context of the survey results which explore many challenges and practices associated with the rapid growth and significant diversity in electronic content and formats.

CASE STUDIES

The following four case studies explore the issues and advantages of implementing aggregated retention scheduling in more detail. Given the relative newness of the approach and lack of published research on the topic, these exclusive case studies will be instructive to professionals whose organizations seek to improve compliance with recordkeeping requirements in structured and unstructured environments. Case studies included in this report are based on the real-world experiences of:

- ✓ The U.S. Government Accountability Office
- ✓ The U.S. Patent and Trademark Office
- ✓ Cargill, Inc.
- ✓ Freddie Mac

U.S. GOVERNMENT ACCOUNTABILITY OFFICE

The U.S. Government Accountability Office (GAO) exists to support Congress in meeting its constitutional responsibilities and to help improve and ensure the accountability of the federal government for the benefit of the American people. The GAO has approximately 3,200 employees, most of who work primarily in one location.

GAO was one of the first federal agencies to respond to the NARA Deputy Archivist's call in 2003 to become part of the records management flexible scheduling "big bucket" initiative. They identified the need to incorporate records management into their information architecture and were looking for a way to help staff to capture records into their existing electronic content management system quickly and accurately.

In response to GAO's interest, a NARA appraisal archivist assembled a team and collaborated to develop a methodology and procedures for the big bucket approach at GAO. This approach included a spreadsheet of current series, which were mapped to work processes and grouped into buckets. Crosswalks were developed between the old and new schedule, and representatives from the lines of business were engaged to validate the NARA recommendations.

Over the course of three years, GAO was able to move from approximately 300 records series to three buckets and 33 sub-buckets. Each bucket has a retention period. The buckets are:

- ✓ Mission or Engagement (5 year retention)
- ✓ Administrative (7 year retention)
- ✓ Policy, Publications and Special Collections (permanent)

It is noteworthy that the retention periods are time-based and not event-based. Among the key lessons learned during this process were:

- ✓ Invite peer review (GAO solicited feedback from peers in other countries on the efficacy of their retention schedules)
- ✓ Secure all the resources necessary to complete the project including contractor and vendor support
- ✓ Make records management part of the architecture
- ✓ Anticipate and plan for turnover on the project team; for example, create orientation and transition processes to support new team members and capture knowledge when team members leave the project
- ✓ Train users on basic aspects of records management (What is a record?, What is a non-record?, How do I apply retention?, How can I find a record once I file it?, etc.) prior to technology roll-out, to ensure consistent application of retention

U.S. PATENT AND TRADEMARK OFFICE

Based in Alexandria, Virginia, the U.S. Patent and Trademark Office (PTO) receives in excess of 325,000 patent applications each year. In January 2004, PTO agreed to partner with NARA to develop and implement a flexible records schedule that employs “big bucket” functions. At the start of the effort, PTO had approximately 1,400 record series.

Using a team of PTO staff and several contractors, the agency’s business mission and activities were closely examined. Leveraging its comprehensive records inventory and a good working relationship with the NARA appraisal archivists, PTO identified five buckets:

- ✓ Policy
- ✓ Patent business area
- ✓ Trademark business area
- ✓ Dissemination (publications)
- ✓ Administration

Crosswalks were constructed to map the legacy records series to the buckets, and to ensure the continuity of the agency’s recordkeeping practices. Three retention schedules—one schedule for each of three of the five buckets—have been approved by NARA; retention schedules for the remaining two buckets are expected to be approved in 2008.

Implementation of the revised retention schedules is slated to begin in 2007. PTO will continue to use a variety of applications and systems to create and store its records, but anticipates that flexible scheduling will enable it to apply retention policy consistently, regardless of format or systems.

CARGILL INCORPORATED

With headquarters in Minneapolis, Minnesota, Cargill Incorporated, a global provider of food, agricultural, and risk management products and services, is engaged in ongoing efforts to globalize their retention management practices. Operating in more than 66 countries, Cargill has more than 158,000 employees and was ranked in 2006 by Forbes as America’s second largest privately held company. Streamlining the retention schedule was one key component of their cross-functional effort to modernize their RM program, and to prepare for deployment of electronic recordkeeping systems.

Cargill has a longstanding commitment to records management; its records retention schedule was first developed in the 1960’s. In 1999, the records retention schedule was updated and modified to include ten functions and approximately 130 categories. In 2002, Cargill established the Records and Information Management Center of Expertise (RIM COE), which was tasked with creating a framework for enterprise governance and reporting. Working closely with global Records Coordinators and IT Representatives, the RIM COE was able to launch a worldwide inventory of electronic and hardcopy records. The RIM COE created a collaborative partnership with Information Protection to aid in rolling out electronic records and information policies, procedures and best practices on a global basis.

Management support for the records initiatives has been strong and continues to play a major role in sustaining momentum for electronic recordkeeping initiatives and goals. By leveraging the company’s global governance infrastructure and resources, Records Management is approaching its goal to make recordkeeping simple for users and busy IT staff. Among the lessons learned to date:

- ✓ Secure strong upper management support
- ✓ Focus on ease of use for users and systems rather than on the number of record categories
- ✓ Don’t underestimate the magnitude of the change management effort (making users aware of changes, explaining new responsibilities, education about the new retention schedules, training on new technology, etc.)

FREDDIE MAC

Freddie Mac is a congressionally chartered, shareholder-owned corporation created to promote liquidity, stability, and affordability in the nation's housing finance system. Freddie Mac conducts its business in the secondary mortgage market by purchasing mortgages from lenders across the country, financed by the issuance of mortgage-backed and debt securities to investors worldwide. Since its inception in 1970, Freddie Mac has helped make housing possible for more than 46 million homeowners and 4 million renters in the United States. The company currently employs nearly 5,500 people.

Freddie Mac recognizes that sound records management practices are essential to achieving legal and regulatory compliance, as well as promoting operational efficiency and effective risk management. Recognizing the value of making it easier to comply with records management policies, Freddie Mac's Enterprise Records & Content Management team undertook a revision of its records retention schedule to help simplify classification decisions by users. The existing schedule was a traditional, functional schedule that contained several hundred record series.

After leveraging record inventories and researching all relevant business processes and associated records across the enterprise, many existing record series were consolidated and larger record series groupings were formed. These large "buckets" of record series were reviewed against applicable laws and regulations and assigned appropriate retention periods. The result: 67 "buckets" located on a website that is linked to policies, procedures, best practices, tips and other useful records management information.

Freddie Mac believes that a retention schedule must be a dynamic document that is flexible enough to accommodate evolving legal, regulatory, and business requirements. Consequently, the Freddie Mac schedule contains a default record series and a process for identifying and creating and for retiring new record series as needed. Record descriptions and sample record types assist users in classifying their documents. Finally, the records retention schedule is supported by employee training, web-based guidance, and legal review.

BIG BUCKET THEORY AND ELECTRONIC RECORDS MANAGEMENT SOLUTIONS

The survey results and case studies discussed above indicate that records management subject matter experts and practitioners are increasingly interested in reducing the number of retention categories/buckets, especially when implementing systems to manage electronic records. This is particularly the case for information professionals who are charged with implementing retention schedules and file plans in software with records management functionality. Examples of such systems include electronic content management (ECM) and other recordkeeping systems.

To learn more about trends and best practices in implementing retention schedules in software systems, Iron Mountain interviewed three technology subject matter experts to solicit feedback on the question: "When a customer implements an electronic records management system, does it matter if the retention schedule or file plan has 800 or 200 or 50 retention categories?" The experts' responses follow.

Bruce Schinkelwitz, CRM, Independent Consultant⁹

Bruce Schinkelwitz, CRM, is an independent consultant and the principal of Foundational, Inc. He has assisted clients in the preparation, planning, and deployment of software solutions, including IBM FileNet Records Manager, IBM Records Manager, and Tower Software TRIM, among other retention-enabling software solutions.

Schinkelwitz echoes the widely held opinion that the risk of having too many buckets is that it becomes harder for end users to determine accurate classification. Arriving at a records retention schedule that meets business needs without unduly constraining usability is, in his experience, a key factor in implementation success. According to Schinkelwitz, “It’s the largest stumbling block for implementation—what filing categories does a user need?”

Schinkelwitz finds that the software solutions are capable of creating as many categories or buckets as clients want. He has observed that the tipping point between smaller, more granular buckets and bigger buckets most often is a function of the size of the deployment. When deploying solutions with thousands of seats, Schinkelwitz notes that clients tend to work towards bigger buckets because they eventually recognize that having fine-grained filing categories is too big a hurdle from the training and implementation perspective. This consideration is especially relevant because the project team often is charged with showing progress as soon as possible. “At the end of the day,” says Schinkelwitz, “deployment of a software solution is subject to project funding cycles, and bigger buckets mean faster deployment.”

Schinkelwitz further notes that, if well-designed, bigger buckets can also help end users classify records for retention because bigger buckets are simpler for them to learn and use properly. He emphasizes that the biggest challenge to successfully applying a technology solution to managing electronic records is determining how to sort the content so that it is accurately associated with retention rules. Generally, for organizations with less than 1,000 users, his experience indicates that 50 retention categories are sufficient. For larger, more complex organizations, more than 100 retention categories make deployment unnecessarily difficult unless those categories can be ‘compartmentalized’ according to business function.

Fiona Schrader, EMC Software⁹

Fiona Schrader is currently Principal Product Manager, Compliance Business Group at EMC Corporation. Schrader states that she has never come across any limitations imposed by EMC software as to the number of retention categories or buckets an organization can establish. However, EMC does point out to customers that the more buckets there are to choose from, the more confusing it is for end users. According to Schrader, “If you have thousands of choices, it won’t be easy for end users to search for and find what they need to classify records. If you want them to classify records correctly, you have to make the experience easier.” Schrader points out another challenge associated with hundreds of category buckets is ensuring that security and access issues around sensitive and confidential records are managed properly within the software.

According to Schrader, EMC suggests that organizations take time to analyze and plan before rushing to implement an ECM software solution. Implementation teams need to talk with the end users, for instance, to find out how they currently classify records such as emails or desktop documents. It is important to encourage more active collaboration among those stakeholders who maintain the file plans and retention schedules (records managers) and those who use them (end users) to ensure that needs are balanced with legal and regulatory obligations and broader business needs.

It is important to note that timelines for organizations to produce records in response to external requests are contracting. The amended Federal Rules of Civil Procedure (FRCP) require each party in litigation to identify or describe, by category or location, documents and electronically stored information that the party may use to support claims or defenses. Furthermore, these matters must be discussed with the other party early in the litigation cycle, at least 21 days prior to a scheduling conference or date of a scheduling order. Accurate classification of electronic records is likewise a necessity for organizations that need to rapidly locate records in response to Freedom of Information Act (FOIA) requests.

Schrader summarizes, “I know that a lot of our implementations have dramatically reduced the amount of categories/retention policies/buckets because the client has taken time before rollout to review the retention schedules/file plans and most importantly, have met with end users to ensure their needs are also met.”

Michele Kersey, IBM

Michele Kersey is currently Program Manager for Records and Retention Management at IBM and former chair, ARMA Technology Advisory Council at ARMA International. In a *KMWorld* article¹⁰, Kersey observed the trend that “records taxonomies” are being flattened as RM professionals strategize how to reduce one thousand “buckets” to one hundred (or fewer). According to Kersey, “Records and information management professionals are recognizing that little buckets are no longer effective, and even alienate an already overburdened user community in the capture, identification, and use of content.”

Kersey is optimistic about improvements in user-independent methods for records capture and categorization, from rules engines to knowledge management indexing and other sophisticated techniques. Whether classification is done by a computer or a human, she notes, “The simplification of retention taxonomies combined with the increasing automation of record capture results in more consistent application of record policies, optimizing organizational performance while minimizing risk.”

TECHNOLOGY PERSPECTIVE SUMMARY

Both information technology and records management experts agree that simplifying granular retention schedules and files plans before implementing them in electronic content, document management, and recordkeeping systems is a worthwhile endeavor. Strong records management and business leadership in reducing the number of retention categories before deployment is crucial. Otherwise, vendors, implementation teams, and their consultants may find themselves in the unenviable position of improvising approaches to simplify retention categories to support successful classification of records by end users, in order to demonstrate progress towards project goals. Problems that can result from this kind of ad hoc approach to “bigger buckets” include over-simplifying the retention schedule into retention categories that are too broad, making it difficult to identify and retrieve records needed for business operations, or respond to legal and regulatory requests.

WILL “BIG BUCKETS” WORK IN YOUR ORGANIZATION?

Big bucket record retention scheduling is intuitively appealing, especially to senior business managers and to IT specialists and system administrators, because it makes records scheduling more understandable and simplifies the work involved to consistently apply retention policy to valued information assets. In the organizations described in the case studies above, the effort required to streamline retention categories yielded positive results for records managers and cross-functional project teams as they assisted their organizations in making progress towards more consistent retention management of information assets.

When considering whether to adopt the big bucket approach, it is recommended that organizations think about the following:

- ✓ Is there a common understanding about functions, activities, and transactions that the business engages in?
- ✓ Is there a complete inventory of the records that the business creates and uses?
- ✓ How strong is the recordkeeping mandate in your organization?
- ✓ What change management resources and expertise are available?
- ✓ What are the real impacts for your business of “rounding up” to the longest retention period?
- ✓ Where is the ECM technology marketplace headed and how might changes in solutions and functionality impact your organization’s ability to implement “big buckets”?

Big bucket scheduling should be approached carefully, since a comprehensive and stable records management infrastructure is critical to its success. Depending on the complexity of the business, the volume of records created, and the resources available, the effort can take several years to complete. Key success factors include:

- ✓ User profiles that capture essential information (metadata) about each function or sub-function
- ✓ A records classification scheme that is mapped to desktop applications; i.e., that users can apply retention categories to unstructured documents and to folders, directories, etc.
- ✓ Logical segregation of time-driven and event-driven retention periods
- ✓ Substantial user training in the use of the records capture system, including the assignment of records to retention categories

Some organizations may be tempted to implement big buckets without corresponding changes to their RM infrastructure and change management process. In the absence of these changes, however, retrieving electronic records for business use or for deletion can be significantly more difficult and costly.

CONCLUSION

In both the public and private sectors, the majority of information is now being created and stored in digital systems. With this change comes a vast increase in the volume of information stored, as well as an increase in the duplication and distribution of information both within and outside organizational boundaries. The numbers and functions of individuals now engaged in creating, storing, retrieving, and disposing of information assets has also increased dramatically.

Retention policy is one of the many “rules” that are applied to information assets (others include security and/or privacy classifications and access privileges, for instance). These rules must be coherent, logical and understandable in order for those who create and use information—knowledge workers, end users, partners, etc.—to do their jobs. Increasingly, these rules must also be practical to implement in technology solutions that classify content at the point of creation, storage, or publication; and by those who manage those systems. While opinions may differ on its application, the majority of subject matters experts believe, big bucket retention scheduling is an approach to developing reasonable, practical, and sustainable practices for the compliant retention and disposition of information assets, while mitigating the risks associated with lifecycle information management.

ABOUT THE AUTHORS

Susan L. Cisco, Ph.D., CRM, FAI

Susan is a Project Manager with Iron Mountain's Consulting Services. Her areas of focus include retention schedule and vital records program management, electronic records assessments, document imaging assessments, and records management program development. Susan holds an M.L.S and Ph.D. in Library and Information Science from The University of Texas at Austin. She is a member of ARMA International, and in 2000 was named as one of ARMA's Company of Fellow award winners. She is co-author of the book, *Indexing Business Records: The Value Proposition*.

Lori J. Ashley

Lori is a Senior Consultant with Cohasset Associates, Inc., providing consulting and educational services to help public and private sector clients improve the performance of their records management programs and practices. Lori co-wrote the 2007 Cohasset/ARMA/AIIM white paper, *Electronic Records Management Survey: A Call for Collaboration*, and co-developed *Assured Records Management*, a cross-disciplinary approach to improving controls for the retention and disposition of electronic records. She currently serves as Seminar Chair for the Madison, Wisconsin, ARMA chapter and was selected as the "2006 Chapter Member of the Year."

RESOURCE LIST

One of the earlier references to the concept of a flexible records series was in 2000 with this FAQ on scheduling: <http://www.archives.gov/records-mgmt/basics/federal-government.html>

In July 2003, NARA's Strategic Directions for Federal Records Management was published: <http://www.archives.gov/records-mgmt/initiatives/strategic-directions.html>

In January 2004, NARA published a document that includes flexible scheduling and the term "big buckets" (now formally used) in its announcement of direction for federal records management: <http://www.archives.gov/records-mgmt/initiatives/flexible-scheduling.html>

The National Archives and Records Administration, *Records Management Bulletins* 2005, Guidance for Flexible Scheduling: <http://www.archives.gov/records-mgmt/bulletins/2005/2005-05.html>

"Lifting the burden: recent case studies show that minimizing record management decision-making by end users results in higher quality ERMS." Timothy J. Sprehe and Charles R. McClure. *ARMA Information Management Journal*, July/August 2005: <https://www.arma.org/bookstore/productdetail.cfm?ProductID=1729>

Converging classification schemes of documents and records - Part 3, September 27, 2006: . http://improving-nao.blogspot.com/2006/09/converging-classification-schemes-of_27.html

REFERENCES

- ¹Schwartz, Barry. *The Paradox of Choice*. New York: Harper Collins Publishers. 2004.
- ²Donald S Skupsky, JD, CRM. *Records Retention Procedures; Your Guide to Determine How Long to Keep Your Records and How to Safely Destroy Them*. Denver, Colorado: Information Requirements Clearinghouse, 1990.
- ³Technical Report ISO/TR 15489-1 Information and documentation — Records management — Part 1: General; and Technical Report ISO/TR 15489-2 Information and documentation — Records management — Part 2: Guidelines. ISO, 2001.
- ⁴National Archives and Records Administration, *Strategic Directions: Flexible Scheduling*, January 2004. Available online at: <http://www.archives.gov/records-mgmt/initiatives/flexible-scheduling.html>
- ⁵ Marcus, Richard W. *Information Management Journal*, v 36, n 2, March 2002.
- ⁶ E-mail communication, March 27, 2007.
- ⁷To view the survey please visit: www.MERresource.com/whitepapers/survey.htm
- ⁸Telephone conversation, July 30, 2007.
- ⁹Telephone conversation, August 1, 2007.
- ¹⁰“Content volume and records management: more and less.” *KMWorld*, v 14, n 8, p 54 September 2005. <http://www.kmworld.com/Articles/ReadArticle.aspx?ArticleID=14310>

© 2007 Iron Mountain Incorporated. All rights reserved. Iron Mountain and the design of the mountain are registered trademarks of Iron Mountain Incorporated. All other trademarks are the property of their respective owners.



745 Atlantic Avenue
Boston, Massachusetts 02111
(800) 899-IRON

Iron Mountain (NYSE: IRM) operates in major markets worldwide, serving thousands of customers throughout North America, Europe, Latin America, and Asia Pacific. For more information, visit our Web site at www.ironmountain.com.