

A Case for Using Line of Business RECORDS COORDINATORS

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In a global economy, more organizations are finding opportunities in locales far from their headquarters' location. This requires their information management (IM) professionals to be aware of the current local, state, and federal information-related laws and regulations everywhere their organizations operate. Ensuring compliance at the organization's distant locations from the confines of the corporate headquarters is near impossible. This case study describes techniques global organizations can use to lower costs and mitigate risks related to managing their information across their enterprises.

Building an IM Plan

Building a comprehensive IM plan takes a coordinated effort at the executive and management levels. The IM team that will develop, implement, and maintain the plan must consider everything from legal matters to information usage and technology, so it should include representatives of all functional areas.

This team must operate in the present, but it must also look to the future, continually scanning the environment to be aware of the need to change information policies and procedures to respond to evolving laws, regulations, and business processes.

Executing the IM Plan

For the IM plan to function properly, the organization's information policies and procedures must be communicated, and they must be enforced throughout the organization. It is difficult for the IM team alone to enforce policies and procedures in distant corporate locations. But, designating line of business records coordinators – individuals within each line of business – to act as team coaches will help ensure corporate-wide compliance.

The corporate IM team should contact the lines of business heads to discuss the implementation of records coordinators within their

departments. It's important to make clear that the role and responsibilities for these individuals can easily be coordinated with their other responsibilities.

Because previous records experience is not necessary for this role, the records coordinators' success depends heavily on the training and communication they receive from the corporate IM department. With basic education about IM policies and procedures, the coordinators will be able to provide insight into their departments' records creation and use, facilitate tasks such as applying the records retention schedule to their departments' records, and help with corporate-wide records projects.

Once trained, coordinators often serve as the first point of contact when daily questions, issues, or concerns arise.

Using Coordinators in a Transition

Organizations in the hospitality industry, which consists of many verticals – such as theme parks, cruise lines, tourism, and hotels – offer useful examples of global business operations.

The hotel industry has some unique IM concerns; one of these arises when corporate-owned or corporate-managed hotels convert to franchise hotels. Because hotels that are converting to franchises do not have a full-time IM professional on staff and may not have appointed someone to oversee the IM program, this process can be more difficult than it is for more typical divestitures.

Like other national and multinational organizations, hotel companies need to be compliant with rapidly changing legal and regulatory requirements that pertain to how they manage information, such as for personally identifiable information, pay card industry information, and financial and tax records that are created in the normal course of business. In most cases, this type of information needs to remain at the

corporate headquarters when a hotel transitions to a franchise.

Moving this information from the transitioning hotel to the corporate location takes coordination among the hotel, the corporate records department, and the third-party storage provider.

Notifications

The transition process begins once the corporate headquarters notifies its records department of a transitioning hotel. At a minimum, the notification should provide the hotel name, address, date of transition, and points of contact at the hotel level so the records department can initiate notifications and coordination among all involved.

The corporate records department needs to be in constant contact with both the hotel and storage provider in case any questions or unusual situations arise during the transition.

Coordinator's Role

First, the corporate records department appoints a records coordinator for the transitioning hotel if one has not been assigned. The records coordinator's responsibility in the transition process is to make sure that any documentation that needs to be housed at the corporate level is properly titled, coded with the proper retention codes from the retention schedule, and indexed for searchability and future disposition.

Storage Provider's Role

Next, the corporate records department notifies the storage provider, who will coordinate with the transitioning hotel to drop off any needed supplies for boxing the physical documents and the pickup dates for the records cartons.

Corporate Records' Role

The corporate records department needs to be in constant contact with both the hotel and storage provider in case any questions or

unusual situations arise during the transition.

The corporate records department also must be mindful of the accounting structure between the transitioning hotel and the storage provider to ensure that the billing, along with the cartons, move to the corporate account. If this is not taken into consideration at the beginning of the transition, there could be billing problems that the corporate records manager may not be aware of for some time.

Using Coordinators for Disposition

In the hotel industry, line of business records coordinators also can be used to assist with the destruction

of physical hard copy records from a third-party storage provider.

The Eligibility Report

To begin the project, the third-party storage provider gathers destruction eligibility reports for each department and shares them with the records coordinators for review. The corporate records department and line of business records coordinators work together to understand the destruction eligibility report. They formulate a plan the coordinators use to work with their respective teams to complete the required destruction request documents, verify that the information is eligible for destruction – that it does not have a tax or legal hold assigned to it – and that it can, in fact, be destroyed.

The Destruction Signoff

The records coordinator or someone else with authority signs the destruction request forms. These are then sent to the corporate records department, where they are subse-

quently processed through the heads of the tax and legal departments.

After obtaining signatures from tax and legal, the records department works with the third-party storage provider to have the cartons destroyed.

The Documentation

The final step in the process is to gather the destruction requests and certificates, place a copy in the organization's repository of record, and provide a copy to the respective coordinator for reference.

Corporate-level IT departments also can work with records coordinators using the same process for dispositioning electronic data residing

in file shares and other repositories.

With the use of the records coordinators throughout the organization, the corporate records department will be able to destroy a large number of destruction-eligible documents and cartons from third-party storage providers with minimal effort and stress. With the proper coordination between IT and the records coordinators, the same results can be realized with electronic data.

Meeting the Evolving Challenge

In this global economy, with business operations reaching every continent and additional countries entering the worldwide marketplace

frequently, the number of information-related laws and regulations grows every day. Laws and regulations also evolve, as even countries with longevity in the international marketplace are changing the way that they do business. (For example, with its coming exit from the European Union, the UK may soon have its own wholly and autonomously conceived canon of laws and regulations that could affect how information originating from or passing across its borders is to be handled.)

IM policies and procedures that are responsive to this dynamic business environment need to be integrated smoothly throughout a global organization. Most importantly, accountability and responsibility for ensuring compliance need to be clearly defined. The best way to meet this growing challenge is to have a well-educated, well-informed IM team consisting of corporate records staff working with lines of business representatives, or records coordinators, from all departments across the organization. **E**



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