

Records and Information Management Program – *“More than Document Retention”*

Judith Nelson

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BlueCross BlueShield of Tennessee

Session: 702

Speakers

- ❖ **Judith Nelson, Vice President, Chief Compliance Officer**
 - ❖ Twenty-five plus years in the health insurance industry
 - ❖ Joined BlueCross Blue Shield of Tennessee in 1999; named VP and CCO in 2008
 - ❖ Experience includes compliance program management and integration into day-to-day business activities; guiding and directing Provider Audit, Enterprise Investigative Services and Security in addition to enterprise Compliance
- ❖ **Susan Whitmire, CRM, FAI, Manager, Enterprise Records and Information Management**
 - ❖ Certified Records Manager and has a 30 year career in records and information management in the insurance industry
 - ❖ Joined BlueCross BlueShield of Tennessee in 2006
 - ❖ Experience includes RIM program development and implementation and delivering solutions for electronic records management and email management.
 - ❖ Earned her Certified Records Manager (CRM) designation in January 1995 and was inducted into the ARMA International Company of Fellows in 2009 as Fellow number 42

Learning Objectives

Upon completion of this session, participants will be able to:

- ❖ Examine organizational business issues and approaches to assessing risks that gain momentum for enterprise content management
- ❖ Apply methods for planning, strategizing, and managing the overall project and program to gain user awareness, adoption, and acceptance of your policies, programs, and tools
- ❖ Identify your internal risks to aid the development of the strategy for your organization

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Agenda

- ❖ Background
- ❖ Planning for Enterprise Content Management
- ❖ Strategizing your Records and Information Management Program for Compliance and E-Discovery
- ❖ Building a Compliant Infrastructure
- ❖ Managing People, Processes and Technology
- ❖ Conclusion

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Background

- ❖ BlueCross BlueShield of Tennessee, Inc. is an independent licensee of the BlueCross BlueShield Association
- ❖ State's oldest and largest not-for-profit health benefit plan
- ❖ Serving nearly 3 million members; more than 15,000 customer companies
- ❖ Based in Chattanooga, Tennessee
- ❖ 5,000 Employees



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Background

1. Litigation
2. Hire a consultant
3. Enterprise Content Management strategy
4. Purchase software solutions
5. Hire a Records Manager
6. What next?

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Background

- ❖ Approach/Methodology
 - ❖ Assess Current State
 - ❖ Enterprise Operations
 - ❖ Technology Deployment & Integration
 - ❖ Identify Enhancements
 - ❖ Recommend Strategy
 - ❖ Communication
 - ❖ Monitoring

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Background

- ❖ RIM Basics
 - ❖ What are records?
 - ❖ Evidence of what the organization does
 - ❖ Capture of its business activities and transactions
 - ❖ Typically a group of related documents
 - ❖ What are not records?
 - ❖ Typically a single email, word document or excel spreadsheet
 - ❖ Records Retention rather than Document Retention
 - ❖ An “Event” begins the retention period

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Background

❖ RIM Program Basics

- ❖ Promote sound records and information management (RIM) practices
- ❖ Manage the corporate retention policy and schedule
- ❖ Consult on issues related to the retention of information
- ❖ Advise and guide the organization on records management compliance
- ❖ Educate and support the records and information program through the development and maintenance of tools required for compliance
- ❖ Support the Legal Department's litigation and discovery process

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Planning

- ❖ Learning about the Organization
- ❖ Identifying the Business Issues
- ❖ Determining where Content Lives
- ❖ Assessing the available Technology

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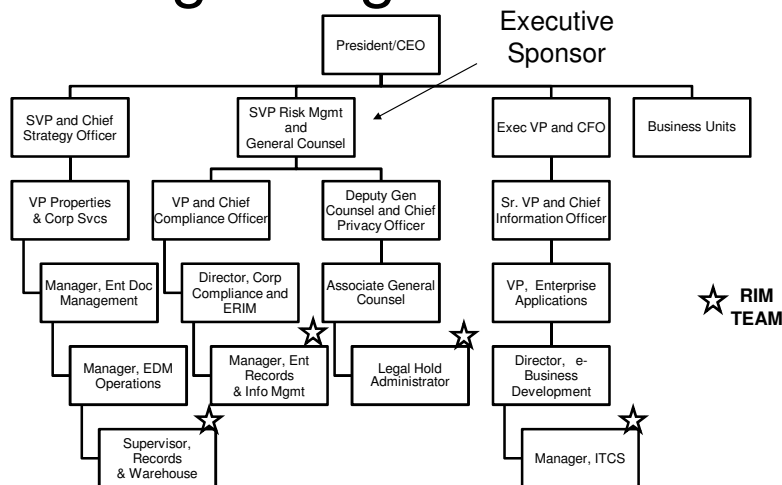
Planning - Organization

- ❖ Industry specific requirements and regulations
- ❖ Existing infrastructure
- ❖ RIM Program organizational reporting
- ❖ C-level support

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Planning - Organization

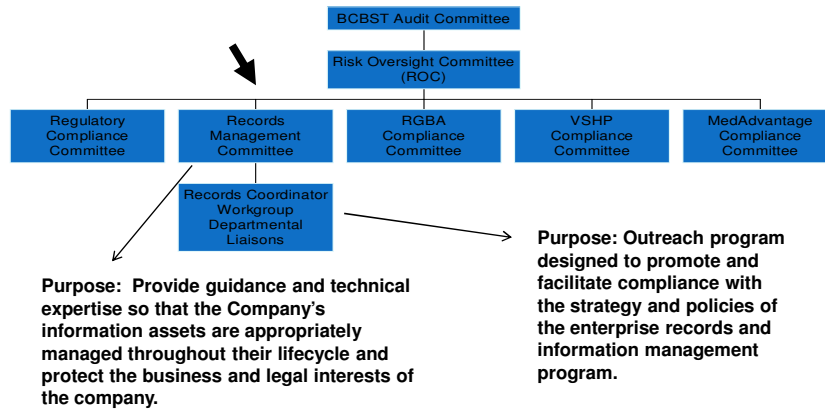


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Planning - Organization

❖ Governance Structure



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Planning – Issues

- ❖ Business issues
- ❖ Leveraging events that necessitate a RIM program
 - ❖ Litigation
 - ❖ Regulatory changes
- ❖ RIM as part of the solution

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Planning – Content & Tools

- ❖ Mediums used to access and store content
- ❖ Systems and applications used to access and store content
- ❖ Is it “records managed?”
- ❖ Tools for managing physical records
- ❖ Tools for managing electronic records
- ❖ Tools that allow end users to manage documents
 - ❖ Records Managed = *Records Manage is defined as the ability to follow the eight Generally Accepted Record-keeping Principles of accountability, transparency, integrity, protection, compliance, availability, retention and disposition. GARP plays a key role in litigation, ethics and compliance.*

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Strategizing

- ❖ Gathering Information
- ❖ Assessing the Risks
- ❖ Developing a Strategy
- ❖ Communicating the Strategy

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Strategy – Information Gathering

- ❖ Asking questions
- ❖ Conducting research
- ❖ Determining applicability
- ❖ Formulating ideas

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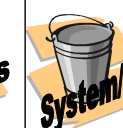
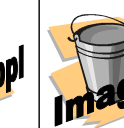
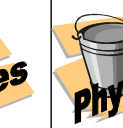
Strategy - Risk Assessment

- ❖ Records and information management risks
 - ❖ Content
 - ❖ Policies and Controls
 - ❖ E-Discovery
- ❖ Classifying and ranking records and information management risks
- ❖ Generally Accepted Recordkeeping Principles (GARP)

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Strategy - Risk Assessment

 Email	 Unstructured EI	 Reports	 System/App	 Images	 Physical
Higher ⇐		RISK	⇒ Lower		
<ul style="list-style-type: none"> • Inappropriate use • Retention • Disposition • Production/ e-discovery 	<ul style="list-style-type: none"> • Collaboration • Retention • Disposition • Legal Holds • Production/ e-discovery 	<ul style="list-style-type: none"> • Searching • Retention • Disposition • Legal Holds • Production/ e-discovery 	<ul style="list-style-type: none"> • Retention • Disposition • Legal Holds • Production/ e-discovery 	<ul style="list-style-type: none"> • Retention • Disposition 	<ul style="list-style-type: none"> • Retention • Disposition • Legal Holds • Production
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Strategy - Development

- ❖ Vision/Mission
- ❖ Program Span
 - ❖ Departmental/Divisional
 - ❖ Company/Enterprise
 - ❖ Governance and Policy
 - ❖ Physical records, electronic records, or all content

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Enterprise Records and Information Management

- ❖ Mission – Establish governing policies and procedures for RIM activities; management, protection and retention of information.
- ❖ Scope – Records and information created, utilized or maintained by BCBST, its subsidiaries and/or affiliates.
- ❖ Purpose – Support the records management requirements of business processes and to reduce risks associated with litigation, investigation or audit.

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Strategy - Communication

- ❖ Promoting the program and concepts
 - ❖ Gaining leverage
 - ❖ Making your point
 - ❖ Audiences and Champions
 - ❖ Available venues

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Building

- ❖ Developing the Implementation Plan
- ❖ Planning the Projects and supporting Initiatives



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Building – Implementation Plan

- ❖ Begin with the greatest impact
- ❖ Develop the program components from risk to solution
- ❖ Establish the overall timeline

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Reduce by Half

- ❖ Implement more effective Records Management practices
- ❖ Reduce amount of records
- ❖ Minimize move costs
- ❖ Facilitate more effective transition

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Reduce by Half - Implement

- ❖ Review existing retention schedule to consolidate into new format including retention research for periods longer than 10 years.
- ❖ Analyze records storage numbers and prioritize areas to address.
- ❖ Summarize gaps in Records Coordinator representation.
- ❖ Inventory and tracking system for physical records management.
- ❖ Purchase and begin using the standard records storage box.

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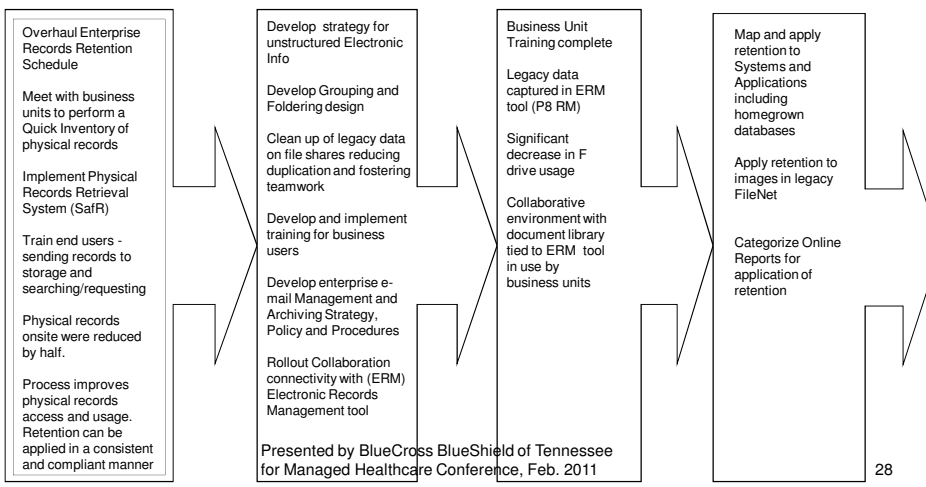
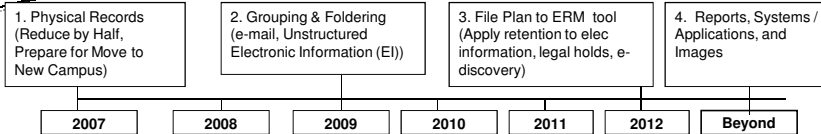
Building - Projects

- ❖ Plan the projects to support the implementation
 - ❖ Set milestones
- ❖ Develop the supporting initiatives for each project
 - ❖ Deliverables
 - ❖ Resources
 - ❖ Project methodology

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Plan of Action



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Managing

- ❖ Managing Outcomes and Demonstrating Progress
- ❖ Maintaining Communication
- ❖ Providing ongoing Education

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Managing - Outcomes

- ❖ Progress demonstrated toward strategic
- ❖ Oversight for activities
- ❖ Moving the plan forward

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Managing - Communication

- ❖ Value add for the organization
- ❖ Feasibility of “pulling” information from a website
- ❖ Necessity of “pushing” reports

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Managing - Education

- ❖ Available venues
- ❖ Change Management
- ❖ Core Values of educational offerings
- ❖ To use or not to use the “Compliance” card

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Conclusion

- ❖ On the path to Enterprise Content Management
- ❖ Lessons learned
 - ❖ Educate, educate, educate
 - ❖ Plan and prepare to change
- ❖ Days, Months and Years ahead

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Questions?



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