

# ***AIIM/Cohasset White Paper***

*Realizing the Need and  
Putting the Key Components in Place  
to "Getting it Right" in Records Management*

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*Prepared by*  
**COHASSET ASSOCIATES, INC.**  
*for*





**Realizing the Need**

**and**

**Putting the Key Components in Place**

**to**

**“Getting it Right” in Records Management**

**Robert F. Williams**

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**R**ecords management (RM), like almost every other component of today's business, is in the midst of a sea change that calls for reassessing, re-thinking, and re-designing almost every aspect of what has been "traditional" in the past. It is not just a revolution in technology, machinery, techniques, software, or speed. Rather, at its core, it is a revolution in concepts.<sup>1</sup> To succeed in understanding and meeting this challenge of change, all organizations will require new paradigms, new perspectives, and new players regarding how all their records, especially electronic records, will be managed.

The goal here is to go beyond detailing the importance and size of this challenge. It is to define certain critically important "enablers" and "links" that are needed—foundations and relationships that survey research conducted by Cohasset Associates, Inc.,<sup>2</sup> shows are only partially in place now. These "enablers" and "links" must be in place to manage records successfully in the future.

The survey research<sup>3</sup> examined here was conducted as part of Cohasset Associates' annual National Conference on Managing Electronic Records (MER).<sup>4</sup> The results contain eye-opening statistics about certain key issues pertaining to records management and, specifically, the foundations and relationships necessary to manage electronic records successfully. It appears clear that certain important and needed "enablers" and "links" are currently missing in many organizations. To meet the increasingly stringent and complex legal, regulatory, and operational requirements for managing records, there must be significant improvements in the process by which organizations manage all of their records.

Historically, records management has been media-centric and driven by a space-reduction paradigm: managers of records principally oversaw the transference and miniaturization of records media so that the space for records in offices could be controlled and, if possible, reduced. Media management and storage space requirements for both paper and electronic records are still a significant matter. Now, however, the traditional media-centric, space-reduction paradigm has been augmented by another paradigm, one that organizations today believe is even more important. It is content-centric and its focus is risk reduction. The addition of risk reduction as a "rationale" for managing records is the result of three ever-increasing forces:

*To meet the increasingly stringent and complex legal, regulatory, and operational requirements for managing records, there must be significant improvements in the process by which organizations manage all of their records.*

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1. **Regulations and Statutes**—with their attendant need to have vast volumes of additional records created to prove the negative, i.e., where the matter at hand was not done wrong.
2. **Litigation**—where the largest cost component is discovery and the most fertile source of evidence is e-records, specifically email.
3. **Volume of Records**—where a) the complexity of how business is now conducted, b) the size of organizations, and c) emails are creating exponential volume increases, particularly in e-records.

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The basis for these “drivers” bringing records management to now be viewed as a key form of risk management is the contents of records—*content evidence*.

The content-centric, risk-management paradigm brings newfound importance to an established, but not always thoroughly or consistently adhered to, component of records management: *management evidence*. Management evidence documents the process by which records are managed and, as such, constitutes keystone evidence in the pursuit of risk containment. Increasingly, in both regulatory compliance and litigation, its importance is growing.

Many new e-records statutes and regulations contain specific records management process requirements. The need for focusing on the process and creating management evidence is an outgrowth of the age-old legal maxim practiced by all litigation attorneys: “when the facts are weak, attack the process that manages the facts.” Thus, whenever the content evidence is weak, litigators will attack the process by which that content evidence is managed, i.e., specifics of the records management processes and program.<sup>5</sup>

To demonstrate credibly that the records in question have been managed effectively and consistently in accordance with industry “best practice” standards, organizations must create and retain management evidence, specifically:

- **Policies**—defining what should be done;
- **Procedures**—defining specifically how the policies should be implemented; and
- **Audits**—documenting that what should have been done was, in fact, done.

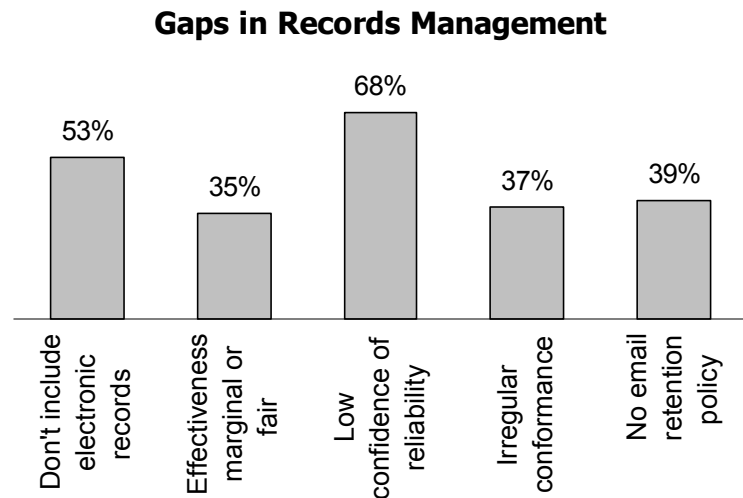
Recent events in the news have created a new-found public awareness of the consequences of records management shortfalls. The results of Cohasset

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Associates' survey research indicate that many organizations are not "getting it right" regarding the way they manage their records. There is much to be done to bring the process of managing records to a level where senior management can have confidence that their organization is not incurring unnecessary risks.

Establishing and maintaining the needed confidence that "all is well" in the management of an organization's records requires establishing and maintaining certain foundational "enablers" and "links" that, according to the results of Cohasset Associates' survey, are today weak at best and, in many instances, effectively non-existent. The seriousness of the current problem is reflected in these troubling statistics:

- 53% of the organizations do not include electronic records in their records management program!
- 35% of the respondents rate the effectiveness of their current records management program as either "marginal" or "fair"—the two lowest categories on a five-point semantic scale!
- 68% of the respondents are "not at all confident" or only "slightly confident" that their organization could successfully demonstrate that its electronic records are accurate, reliable, and trustworthy many years after they were created!
- 37% of the organizations follow their records retention schedules "not regularly" or only "when time permits!"
- 39% of the organizations do not have a formal email policy regarding retention practices for email!



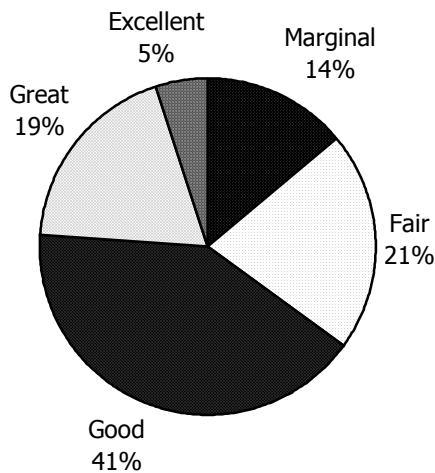
This analysis of the survey results has a three-part focus: 1) Identifying the extent to which the established records management programs have operational problems, 2) Detailing certain core issues necessary to meet the technical challenge of managing electronic records, and 3) Assessing the needed capability of meeting the organization's legal responsibilities. Each of these three parts also will address the key issue of "enablers" and "links"—what is missing and what actions are needed.

### Demonstrating the Operational Basics of a Successful Records Management Program

Records constitute the “Corporate Memory” of an organization’s daily business actions or events and as such, constitute the evidence that later can be reviewed, analyzed, or used to document the specifics of those actions and events. The management of this document-based information is well established vis-à-vis paper and microfilm—historically in an archival preservation context and more recently in the added context of records management with comparatively shorter retentions.

In Cohasset Associates’ survey, records managers assessed the effectiveness of their organizations’ records management programs. Slightly more than one-third (35%) of the respondents rated their organizations’ records management

**Effectiveness of RM Programs**



program as being deficient, in that their program’s effectiveness was just “marginal” (14%) or “fair” (21%). Conversely, less than one-quarter (24%) rated their program as distinguished in that its effectiveness was “great” (19%) or “excellent” (5%). This would strongly suggest that in the great majority of organizations (76%) there is a significant opportunity for improving the effectiveness of the records management program.

The degree to which there is a need for improvement of existing programs is very significant and

very troubling. *Conclusion: the profession of records management needs to substantively improve the performance and effectiveness of the basic elements comprising a records management program.* Although specific programs are successful and credible, the records management profession, when engaging in valuable self-evaluation, recognizes that it is not getting the job done. The need for improvement is further supported by the fact that 14% of the respondents stated that their organizations did not even have a formal records management program. In today’s business world, for any organization to not have a formal records management program is an unacceptable course of action and business risk.

It is widely accepted that the “keystone” of every records management program is records retention schedules. To be effective, retention schedules have to be adhered to and periodically updated. Thirty seven percent of the respondents said their organizations followed their retention schedules only



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“when time permits” (16%) or worse, “not regularly” (21%). Fifty five percent “generally” followed their retention schedules, and 8% “always” did.

Properly administered retention schedules should embody an organization’s policies regarding records retention. In legal proceedings, a key test of policies is, “Were they followed?” When it comes out in court that policies are not followed, it is usually an important “score” for the opposing side—so important that the axiom usually is, “It is better not to have a policy than to have one that is not followed.” With nearly 40% of the respondents manifesting a serious deficiency in their response on this matter, senior management have good reason to be very concerned about potential legal problems that could severely damage or jeopardize their organization. In a related, but separate question, respondents were asked whether their records management program operated in accordance with formal/approved policies and procedures—75% said yes, 25%, no.

Clearly, a significant number of organizations have very inadequate basic records management programs and practices. Accordingly, they are exposing themselves to unnecessary legal, regulatory, and business risks. The reality is that they are managing their document-based information asset in a way—some may contend a negligent way—that is inferior to their management of other critical corporate assets such as people, money, material, and facilities.

If this survey research has statistically defined the size of certain basic records management problems more clearly, what are the “enablers” and “links” that are needed to address them? The author’s experience of more than thirty years as a records management consultant corroborates that records management programs have long suffered from a lack of consistent senior management support. This certainly is not universal, but it definitely is very widespread. The core enabler of every successful records management program is senior management support. That support must not be limited to the project of establishing or upgrading a program, but rather, must be ongoing. In addition, records management must be an important component of the organization’s risk-management efforts. The risk-management efforts must include analysis of risk assessment, risk containment, risk liability, and the constant focus on particularly risky situations.<sup>6</sup>

In addition to ongoing support, management also needs to ensure that an “action team” has the necessary responsibility and ability to oversee and guide the records management program. Like a vehicle or NASCAR racer en route to a destination or victory, the program must have a driver (law/compliance),

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a mechanic (IT), and a "spotter" or navigator (the records manager). As will be shown with greater statistical specificity later, this team of complementary expertise is lacking in many organizations. Without such a team, the "vehicle" (program) always seems to "run out of gas" (lack of legal involvement), "break down" (lack of IT support), or "miss key turns" (lack of records management guidance). Senior management must be committed, not just to establishing this unique "partnership of capabilities," but also to supporting the partnership's operational efforts and measuring its results.

Given that a) records are ever-increasing in their volume, importance, and complexity and b) deficient records management is an unacceptable business risk, organizations must conclude: having a "best practice" records management program with the right team of legal, IT, and records management expertise to run it is no longer a nicety, it is a necessity; it is no longer an option, it is a requirement.

### **Understanding the Core Issues of Meeting the Technical Challenge of Managing Electronic Records**

Cohasset Associates' survey research asked whether participants' organizations had a formal policy regarding retention practices for email. The results were 61%, yes, and 39%, no—reflecting that nearly 40% of all the organizations have yet to implement a corporate policy regarding email retention. In an era when evidence from emails has made a verdict-defining impact on many court cases, it is clear that many organizations do not yet fully appreciate the business risk of unnecessarily retained email. Further, they also have not made the conceptual distinction that email is just a vehicle for delivering information (like the traditional envelope) and is not a records series in the traditional records management context. Accordingly, email does not warrant substantive retention in most cases.<sup>7</sup> Not having any email retention policies inevitably will result in the amassing of vast volumes of communications that are costly to retain, even more expensive to search through in response to discovery requests, and may unwittingly supply information that is harmful to the organization if disclosed in response to discovery requests.

Regarding electronic records in the broader context, 53% responded that their organizations did not have records retention schedules for their electronic records. This means that the application of the organization's retention schedules is not media neutral. In turn, this reflects that the organization's commitment to its retention policies is not being consistently and universally applied.

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It is clear that the effective management of electronic records is still in its adolescence and there is much that needs to be done. Few organizations, if any, really “have their act together” in the context of having implemented a comprehensive, credible, and effective electronic records management program—either as a stand-alone effort or as part of an established paper/microfilm program. It is the author’s professional experience that this is in part the result of not having the necessary software tools. However, to a much greater extent, it is the result of two unresolved questions: 1) who is the “owner” of the responsibility for overseeing the management of electronic records, and 2) who can “make it happen?” Answers to these two key questions are needed. However, the responses to the next questions show that these answers may not be coming as soon as they are needed.

Recognizing a) that the retention of records compels a “life-cycle” (birth to death) perspective, and b) IT, because of its superior technological expertise, has to-date had the principal operational responsibility for overseeing the management of electronic records, the question was posed: “Do you believe that IT in your organization really understands the concept of life-cycle regarding the management of electronic records?” Twenty seven percent responded yes; 73% said they did not believe IT understood the life-cycle concept.

In contrast, by a similar nearly 3:1 ratio, 72% of the respondents stated that the primary responsibility for the day-to-day management of electronic records in their organization was IT, and records management, 28%. The conclusion is that there is little confidence that IT understands the core concepts of records management, even though it has the primary responsibility for managing electronic records in most organizations.

This distrust and professional disconnect is further reflected when addressing the issue of long-term digital preservation. Ninety seven percent of the respondents believe that the process by which electronic records are managed will be “important,” “quite important,” or “very important” in future litigation. However, only 47% of the respondents believe that IT understands that it will have to migrate many of the organization’s electronic records to comply with established retention schedules. Just 25% believe that their organizations today have policies and procedures to migrate older records so that they will be accessible throughout the prescribed record retention schedule. If this perception is accurate, and the capability to successfully migrate records is not acquired soon, what historically has been known as the “Corporate Memory” will soon be better known for its “Corporate Alzheimer’s”—records that are there, but not accessible because the software

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and hardware needed to access them have been rendered obsolete and the retained records have not been migrated forward.

Corporate Alzheimer's should not be viewed as merely a "possibility" in the "future" and therefore a day-forward problem. For many organizations, it is "here" and "now" even though they do not know it and are not prepared for it. Consider this hypothetical: three months from now, unforeseen litigation is filed against your organization. The records requested in discovery involve the reconstruction of transactions that occurred seven to eight years ago—within the statutes of limitations for such events. How will your organization access, review, and produce the requested records from those legacy systems on which they were created and stored? The degree to which this would be easy or difficult will vary from one entity to another. If it is going to be difficult for your organization to do it, that fact should be known now.

In the future, the answer regarding access might be "from migrated records." However, that is then and this is now. The immediate issues are: Does your organization's IT group have a plan in place to respond? How long would it take? What would it cost? The potential immediacy of such a hypothetical, together with the consequences of not being responsive in a timely, cost-effective manner, mandates that the "action team" referenced earlier make the development and testing of a strategic plan for such scenarios an immediate priority.

### **Sarbanes-Oxley Act of 2002**

*By Rae N. Cogar, Esq.*

In response to the numerous corporate accounting scandals that have plagued U.S. businesses recently, a new law was signed by President Bush on July 31, 2002, the Sarbanes-Oxley Act of 2002. This Act creates the Public Company Accounting Oversight Board (Board) to oversee the audits of public companies subject to securities laws. This Act contains reforms in the corporate governance and disclosure rules applicable to publicly-traded companies and new requirements for companies (registered public accounting firms—"registered") that provide audit services to such companies. A number of the Act's provisions became effective immediately, while other provisions will be implemented over the course of the next twelve months through the Securities and Exchange Commission (SEC). Of major importance to the records management profession are penalties for the destruction of records, retention time frames for certain audit records, and document production requirements.

The important highlights of this act that affect records management are:

- Anyone who knowingly alters, destroys, conceals, or falsifies documents or tangible objects with the intent to impede, obstruct, or influence an investigation involving federal departments and agencies or bankruptcy proceedings will be subject to fines and/or imprisonment of up to 20 years.

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It is Cohasset Associates' professional experience that in many organizations IT appears to be oriented towards a near-term perspective that does not properly take into account IT's critically important role in the long-term management of electronic records. It is said that IT's perspective on documents is: "produce them cheaper, prettier, and faster." Now, with IT's new-found responsibility for technically overseeing the management, particularly retention, of electronic records through their digital life, there is a compelling need for IT to clearly demonstrate that it understands how to successfully execute key records management principles.

For many IT organizations, records retention and long-term record preservation are new dimensions to traditional IT responsibilities. Electronic records management (ERM) seems to appear only fleetingly on IT's radar and then it typically is not given much priority. IT, as referenced earlier, is the "mechanic" to making ERM happen and, as such, IT is the critical "enabler" in the overall process of retaining and successfully accessing electronic records over time. To date, however, IT's demonstrated prowess in accepting this new ERM responsibility has not been well communicated, to the extent that it even exists. Thus, the "links" that are needed are threefold.

- First, there must be a better demonstration of IT's understanding of the unique problems and issues associated with the management of electronic records. To achieve this, IT very much needs to have records managers as

- Anyone who attempts or conspires to commit any offense under the Act will be subject to the same penalties for committing the offense.
- A violation of the Act's audit records retention requirements is punishable by up to 10 years imprisonment.
- Any accountant conducting an audit of a publicly-traded company is required to retain all audit or review work papers and related documents for a period of five years from the end of the fiscal year in which the audit or review was conducted. Knowing and willful violations of these requirements are subject to up to 10 years imprisonment, fines, or both. The SEC may establish further record retention requirements, which will have the same penalties.
- A registered firm must retain audit work papers and other related information to support the audit reports required under this Act for a period of not less than seven years.
- The Board may require further retention requirements by registered firms for inspection of records whose retention is not required by Section 103 (audit and work papers) or additional rules that may be issued under that rule by the Board or the SEC.

*(continued on page 10)*

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“project and process partners” on this matter. Currently, 40% of the respondents reported that IT was not even represented in their ERM process. Clearly, there is a need to improve communications between records managers and IT.

- Second, IT must exercise greater leadership in acquiring the needed hardware and software to do the ERM job—it alone has the technical expertise and budget to do this.
- Third, given an increased understanding of ERM and improved communications with records managers, IT needs to evolve from a role of being “pushed by the process,” to “process puller.”

### **Having the Capability to Successfully Meet the Organization’s Legal Responsibilities**

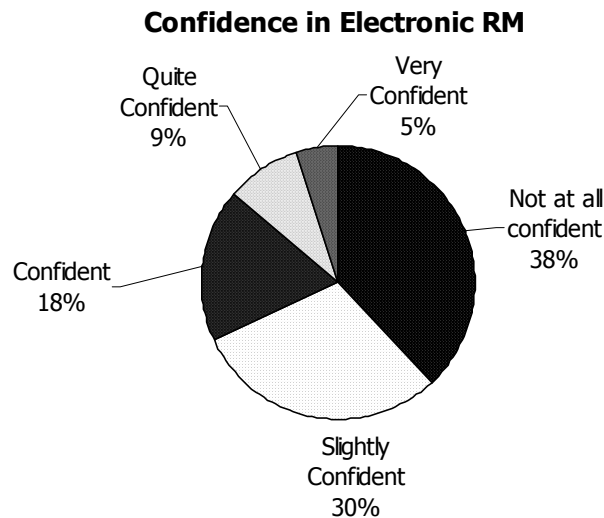
Among trial attorneys, it is a cardinal principle that credibility is the defining factor in determining the outcome of almost all litigation that goes to trial. To be used in a legal proceeding, records first must be admitted into evidence. To do so, it first must be demonstrated that the records are accurate, reliable, and trustworthy. The much greater complexity of electronic records over their paper counterparts presents added challenges to demonstrating that they are accurate, reliable, and trustworthy.

It is significant, therefore, when the respondents in Cohasset Associates’ survey stated that on a five-point semantic scale of 1 (“not at all confident”) to 5 (“very confident”), only 5% said they were “very confident” that their organization could successfully demonstrate that its electronic records would be accurate, reliable, and trustworthy many years after they were created. By contrast, 38% responded that they were “not at all confident.”

#### *Sarbanes-Oxley Act of 2002 (cont.)*

- The Board may require production of audit work papers and other documents or information held by a registered firm considered relevant in an investigation and may inspect such records to verify the accuracy of any documents or information supplied.
- The Board may require the production of any document in the possession of any other person, including a client of a registered firm, which may be relevant to an investigation.

Consider the specifics of the full spectrum of responses:



In contrast to this lack of confidence in IT capabilities, the respondents overwhelmingly believe (95%) that the process by which electronic records are managed will be important in future litigation. Given this perceived importance and associated lack of confidence, there is clearly a need for prompt and significant action in this regard. It is the author's professional judgment that the legal department needs to lead the effort to ensure that today's fears are not tomorrow's realities. The legal department best understands the catastrophic consequences of not having accurate, reliable, and trustworthy records. It also has the special "ear" of senior management to facilitate the resolution of this critically important problem.

The final focus of Cohasset Associates' survey research was Record Hold Orders—suspending the organization's established records retention schedules to retain for "as long as is needed" those records that either a) a court (or other entity of authoritative jurisdiction) determines might be relevant to a dispute at hand, or b) the organization's law department may determine would be relevant to an imminent or clearly foreseeable dispute. Only 67% of the respondents reported that their organization has a formal system for Records Hold Orders. Even more significant, less than half (44%) reported that their system includes electronic records. With both the exponential growth of electronic records and the fact that they have recently proven to be the most fertile area for discovery, it is nothing less than extraordinary that there is such a void in organizations' current systems for complying with Records Hold Orders.

*The legal department needs to lead the effort to ensure that today's fears are not tomorrow's realities.*

This systems shortfall should not be interpreted as necessarily a compliance shortfall, i.e., that those organizations that do not have a system are not complying with such orders. It simply means that these organizations do not have a formal system in place to ensure compliance and therefore, in the absence of such a system, there is a greater probability that compliance may not be achieved.<sup>8</sup>

*Only 67% of the respondents reported that their organization has a formal system for Records Hold Orders. Even more significant, less than half (44%) reported that their system includes electronic records.*

This issue should have a high priority for legal departments, given their greater understanding of the powers of courts to issue sanctions and other appropriate remedies to achieve compliance. The legal department also best understands the very damaging implications that non-compliance can have on the outcome of disputes.

In the domain of legal matters, the legal department must be the primary “enabler.” The issues detailed above should motivate greater interest and involvement in the resolution of those matters. As such, the legal department should spearhead the development of needed new communications and operations “links” to IT, records management, and business units. To accomplish this, legal resources must be proactively allocated, not on just a project basis, but over time on a process basis. The importance of these issues at

hand compels action. Indeed, the immediacy of these issues compels action now—both to resolve the problems that are outstanding and, wherever possible, to confirm where there may not be a pressing problem.

From Cohasset Associates’ pioneering survey research and its analysis of the responses, four valuable conclusions can be drawn:

1. **The quality with which electronic records are managed is clearly “dangerously spotty.”** Many organizations have serious deficiencies in how they manage their electronic records—greater in number and significance than those entities may have realized.
2. **Certain deficiencies constitute significant risk-management issues.** In the organizations where they exist, these risks should be deemed “unacceptable” and addressed promptly.
3. **ERM success calls for a “partnership of capabilities” that should involve the legal department, IT, and records management.** All three constitute important “enablers” to achieving success. Optimally, the “driver” behind this partnership should be the legal department.
4. **The most important success “enabler” is management’s proactive, not reactive, commitment to ERM.** And this commitment must be to an ongoing process, not just a short-term project.



### End Notes

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- 1 Paraphrased from a statement by Professor Peter Drucker.
- 2 Cohasset Associates, Inc. ([www.cohasset.com](http://www.cohasset.com)) is one of the nation's foremost management consulting firms specializing in document-based information management. Cohasset's professional services include management consulting, legal research, education, and publishing.
- 3 Two separate surveys were conducted. The first survey involved approximately 350 people who attended the MER conference in September 1999. These respondents were approximately 25% attorneys (in house counsel), 25% IT, and 50% leading records management practitioners. The second survey was conducted in August/September 2001, where the 150 respondents were comprised of a random cross-section of professionals responsible for records management in their respective organizations—all members of the renowned Records Management List. The phraseology of the questions was the same in both surveys. In analyzing the results, the legal, technical, and operational implications of the survey data have been taken into account.
- 4 The National Conference on Managing Electronic Records (MER) ([www.cohasset.com/mer](http://www.cohasset.com/mer)) is the only annual conference that focuses exclusively on the life-cycle management of electronic records. The MER delivers "cutting edge" information on the key legal, operational, and technical issues associated with the management of electronic records.
- 5 To better understand the perspectives of a litigator regarding records, readers are invited to visit Cohasset Associates' website ([www.cohasset.com](http://www.cohasset.com)) and, from the home page, select "As a Trial Attorney, How Would I Attack the Way You Manage Your Electronic Records?" which presents a landmark presentation from Cohasset's National Conference on Managing Electronic Records (MER).
- 6 Thomas L. Sager, Esq., James D. Shomper, Esq., and Richard L. Horwitz, Esq. *Leaps & Bounds—Moving Ahead With The Dupont Legal Model*, Wilmington, DE: E.I. du Pont de Nemours and Company, 2001, p. 60.
- 7 Where the short-term retention of email is established, the appropriate retention of pertinent, more valuable information can be achieved, for example, with attachments that are detached, filed, and then retained in accordance with established retention schedules for such record series.
- 8 A court recently imposed a seven-figure penalty on a financial services company in a high profile lawsuit. It was not the destruction of records itself that prompted the penalty; rather, the court noted, it was the company's failure to have a policy in place to ensure that records were not destroyed. Randolph Kahn, Esq., "Be a Good Steward of Your e-Records," *Directors & Boards*, Spring 2002, p. 47. See also, *In re Prudential Ins. Co. Sales Practices Litig.*, 169 F.R.D. 598 (D. N.J. 1997).

### **About the Author**

#### *Robert F. Williams*

Robert F. Williams is president of Cohasset Associates, Inc., one of the nation's foremost management consulting firms specializing in records management and document imaging systems. Under his direction, Cohasset Associates has more than 30 years of experience and an unprecedented award-winning record of accomplishments in providing consulting services to clients throughout the United States. Mr. Williams also is a renowned educator who has organized and presented the annual National Conference on Managing Electronic Records (MER) focusing on the legal, technical, and operational issues of managing electronic records. Mr. Williams is a Fellow of both the Association of Information and Image Management (AIIM) and the Association of Records Managers and Administrators (ARMA)—the only person so honored. He can be reached at [williams@cohasset.com](mailto:williams@cohasset.com).

### **About the Sidebar Author**

#### *Rae N. Cogar, Esq.*

Rae Cogar is a senior consultant at Cohasset Associates, Inc. specializing in the legal and compliance issues relating to successfully managing corporate records—particularly electronic document and electronic signatures technologies. Regulatory compliance, privacy, security, retention, and destruction as well as policies and procedures are among the many specific issues for which clients have sought her expertise. Ms. Cogar is the author of many articles. With her unique professional background in law and records management, together with over 18 years of experience, she is a highly sought speaker. She can be reached at [rcogar@localnet.com](mailto:rcogar@localnet.com).

### **About Cohasset Associates, Inc.**

Cohasset Associates, Inc. is one of the nation's foremost management consulting firms specializing in document-based information.

Cohasset's mission is to help its clients successfully meet their legal, regulatory, and business objective of managing their records—the all-important evidence that enables companies to support current and future management decisions, satisfy customers, achieve regulatory compliance, and protect against adverse litigation.

With its focused expertise and extensive records management, legal, and technical experience, Cohasset provides its clients with incisive and practical solutions for managing their document-based information—from paper to electronic records.

Cohasset's professional services are:

- **Management Consulting** – Cohasset is in its fourth decade of serving clients that now number more than three hundred. Cohasset's client engagements range from establishing effective corporate records management programs to planning state-of-the-art electronic records systems, to implementing policies and procedures, to conducting gap analyses, and statements of needs.

Using its records management, legal, and technical skill sets, together with its extensive experience, Cohasset develops and delivers cost-effective solutions—that both achieve the business objectives of Cohasset's clients and also meet their legal/regulatory responsibilities.

- **Legal Research** – Cohasset is recognized for its leadership in providing exceptional legal research—from the legal rationale that supports records retention schedules to pioneering analyses of electronic records issues.
- **Education** – Cohasset organizes, sponsors, and presents the annual National Conference on Managing Electronic Records (MER) that is renowned for its quality and educational leadership.
- **Publishing** – Cohasset also is the long-established leader in publishing definitive information about the legality of storing records on non-paper media as well as strategies for preserving digital records.

Cohasset Associates has been described as the only records management consulting firm with its feet in the trenches and its eyes on the horizon. This blend of practical experience and a vision of the future, combined with its commitment to excellence, have resulted in Cohasset Associates' record of accomplishment and innovation.

The distinguished work and innovative concepts of Cohasset Associates have been recognized with the highest professional awards from the Association for Information and Image Management (AIIM), the Association of Records Managers and Administrators (ARMA), and the Institute of Certified Records Managers (ICRM). Website: [www.cohasset.com](http://www.cohasset.com)

### About AIIM International

#### The Enterprise Content Management Association

AIIM International is the global authority on enterprise content management (ECM). ECM technologies, tools, and methods are used to capture, manage, store, preserve, and deliver information to support business processes. AIIM promotes the understanding, adoption, and use of ECM technologies through education, networking, marketing, research, standards, and advocacy programs.

As a neutral and unbiased source of information, AIIM is uniquely positioned as a 501(c) 6 non-profit association dedicated to growing the Enterprise Content Management industry through its:

- **Market Education:** Expand the global market for ECM solutions. Provide educational programs and information services that help users make informed and effective technology decisions, and help suppliers better understand user needs and requirements.
- **Networking:** Through chapters, programs, and the Web, create opportunities that expand the global base of users seeking ECM solutions and allow our user, supplier, and channel members to engage and connect with one another.
- **Industry Advocacy:** Through our own efforts and strategic partnerships, become the global voice of the ECM industry in key standards organizations, with the media, and with government decision-makers.

The AIIM community has a variety of opportunities for you. Visit us on our website at [www.aiim.org](http://www.aiim.org).

AIIM BookStore	<a href="http://www.aiim.org/bookstore">www.aiim.org/bookstore</a>
e-doc Magazine	<a href="http://www.aiim.org/edoc">www.aiim.org/edoc</a>
Standards	<a href="http://www.aiim.org/standards">www.aiim.org/standards</a>
Chapters Network	<a href="http://www.aiim.org/chapters">www.aiim.org/chapters</a>
Essential ECM	<a href="http://www.aiim.org/essentialecm">www.aiim.org/essentialecm</a>
AIIM Marketplace	<a href="http://www.aiim.org/marketplace">www.aiim.org/marketplace</a>
Listing of various events	<a href="http://www.aiim.org/events">www.aiim.org/events</a>

Become part of the AIIM community by becoming a Professional Member. Visit [www.aiim.org/join](http://www.aiim.org/join) for details.





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