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# THE INFORMATION MANAGEMENT DIGEST

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A Service of Data Storage, Inc.

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## TRANSPORTING AND RELOCATING RECORDS

First ask these questions: why are records being moved, and which records are to be moved? If these questions relate to a Disaster Recovery Plan or a Business Continuity Plan, then you are miles ahead because the need for prioritizing records has already been established. Aside from this, records may be moved because their activity level has decreased and as part of information life cycle management, they are due to be sent to storage space that is less expensive. Or a corporate relocation from one building or city to another necessitates moving records as well as people and furniture.

Assuming there is a large quantity of paper records in storage boxes that need to be moved, there is a long list of logistical considerations facing the records and information management director. The following information is based on real-life, hands-on experiences of RIM managers who had to move large quantities of records as part of their jobs and who shared experiences via e-mails.

### **Put them on pallets. Don't stack them individually in a truck.**

There was general agreement that record boxes should be put on pallets and shrinkwrapped because the wrapping stabilizes them on the pallet as well as giving some protection against moisture. Not only do pallets give mobility, they also provide some elevated protection from a wet floor which might happen in a truck trailer during a very heavy rainstorm.

One participant in the online discussion recounted a horror story in which employees from a moving company were not closely supervised and stacked individual boxes to the top of the truck, packing walls of boxes from front to back. When the truck reached its destination and the doors were opened, boxes started falling out because the bottom layer of boxes had been crushed.



So, how many boxes will fit on how many pallets, and how many pallets will fill up a truck? One respondent suggested 50 boxes per 40"x48" pallet, but the majority of others suggested 40 boxes per pallet. Most thought a 48- or 53-foot trailer would hold 22 pallets. Another factor is highway weight limits for trucks and that can determine the size of the load.

Getting a box off the shelf and onto a pallet means it is handled less than if it were individually stacked into a truck. Boxes can be inventoried as they go on pallets which can greatly aid if a search is needed later before boxes are reshelved.

If a large quantity of records must be moved within a certain time frame, the RIM manager must make sure he or she has enough equipment to speed up the process beyond normal operating times. This could mean renting more forklifts or pallet jacks or ladders or shrinkwrapping machines and the people to operate them. Is there floor space at your loading dock for this extra activity as well as at the other receiving dock? Will you need more equipment there as well?

## What about the trucks?

How many pounds of records will you have, and where are they going? The size and weight of the shipment will be a factor in choosing an over-the-road truck line, a local moving company, or even an air freight company.

Ideally your records will leave your dock in a sealed trailer and go directly to their new home. This will not happen if you have to use a less-than-truckload carrier. Your shipment will likely go to a terminal and be put on another truck going to the destination city or close to it. Your records may then be shifted to a local delivery truck which brings them to their final destination. They are in and out of trucks and may sit on docks exposed to the weather.

Right from the beginning, determine with the trucking company who will load the truck before leaving and who will unload it at the other end. Will it be your employees or trucking employees?

## Have you moved your vital records?

Assuming you have identified your vital records, have they been imaged and moved to an offsite location where they can be accessed in time of need? Are there other records that are necessary for business continuation that should be moved in case of a disaster affecting a wide area of your region? Consider contracting in advance with a trucking company that can get these records moved to another location, perhaps a branch office in another city, if disaster strikes locally.

## How do you document records that are moved?

The National Archives and Records Administration (NARA) has very specific procedures for the movement and transfer of records from government agencies into NARA's custody. If your organization has not formalized a process for transferring records or moving them to another facility, here are some stipulations from the Internal Revenue Service for moving IRS records to NARA. These forms of identification could be a guide to developing your own custody process for records before they are moved.

- A. Record series or title
- B. Date span of records—beginning and ending
- C. Major and minor subdivisions
- D. Contact person with phone number
- E. Record custody authority
- F. Volume and medium (paper, tape, disk, etc.)
- G. Any restrictions such as the Privacy Act or HIPAA
- H. Finding aids or documents
- I. Current location of the records

## It may be time to call in the experts.

If you are working with a records storage contractor now, that person may be able to provide trained staff, for an hourly fee, who can come into your facility and speed up the process of getting records ready to be moved. These persons can augment your staff with the work of making an inventory, organizing, packing and barcoding boxes as they go onto pallets and are readied for the dock.

Your storage contractor will likely be able to furnish trucks for moving records locally. Ideally, that person will also have knowledge of over-the-road truck lines that can provide dependable and trustworthy service in moving records from one city to another.

Something that may come to light during this process is the discovery that certain groups of records can go into "deep" inactive storage at money-saving low rates while others will go into more-accessible storage with higher rates.

## "Do we really need all these records?"

Also, the contemplation of moving a huge amount of records may trigger a re-thinking of retention and destruction schedules when it becomes clear how much it will cost to move records once considered necessary and valuable. If this is the case, it becomes important to find a records destruction contractor who can certify destruction of records rather than carelessly selling them to a paper recycling center where they may be accessible to the public or may be sold to the overseas paper market.

Your storage contractor may offer records destruction as part of the full spectrum of services, or he or she can direct you to a trustworthy destruction company.



"We back up our data on sticky notes because sticky notes never crash."

# Is Your Company Destined to Make Headlines for Its Handling of Sensitive Records and Information?

## *International association offers tips on how you can avoid pitfalls in information management*

Making headlines can be a good thing – unless it's because your organization has mishandled its sensitive records and information. Just ask Affiliated Computer Services, Radio Shack, TJX, the most recent examples of this apparent phenomenon.

- On April 9, the Georgia Department of Community Health announced that Affiliated Computer Services confirmed the loss of a CD containing personal data of 2.9 million Medicaid and PeachCare for Kids™. The data was presumably not encrypted and included personal, identifying information – including full names, birthdates, and Social Security Numbers.
- On April 2, the Texas State Attorney General filed suit against Radio Shack Corp. (to be heard in the district court of San Patricio County, Texas, case number S-07-5333CVC) because employees at one of its stores dumped bulk records containing unencrypted personal, identifying information for thousands of customers in garbage receptacles behind the store. Radio Shack could face fines of \$50,000 per incident, plus civil penalties of up to \$500 for each abandoned record. (<http://www.oag.state.tx.us/oagnews/release.php?id=1961>)
- On March 28 TJX revealed that hackers accessed credit card and debit card information for almost 46 million customers in 2005 and 2006, plus drivers license numbers and other personal information for an additional 451,000 customers who returned merchandise. It's being called the biggest financial breach ever.

The costs of such incidents can be devastating, not only financially but also in terms of customer trust.

“The only protection any company has against these types of occurrences is a well-developed, enterprise-wide records and information management program,” states Marilyn Bier, Executive Director of ARMA International, a not-for-profit association and authority on managing records and information. Not only do the policies and procedures have to be in place and well documented, adds Bier, but there must be adequate training throughout the enterprise.

So how do you ensure your company doesn't suffer a similar fate as these and many other companies (remember Bank of America, Choice Point, DSW)? Here are some important steps you can take today:

**Form an information management compliance team.** In today's information-centric enterprise, compliance requires that Legal, IT and RIM all be at the table. No one department can provide a complete solution to ensure your company is compliant with current regulations, effectively protecting its data, and ready for electronic discovery in case of litigation. Assemble a team from these and other key compliance-related areas to work together to assess the organization's potential

risks and identify the policies, processes, and technology required to address them.

Assess your current program's potential risks. Before you can identify solutions, you need to know what the problems are. You need to find out where your current records and information management program is vulnerable. Do you know what information you have, where it's located, and how to retrieve it? Particularly your e-mail and other electronically stored information (ESI)? Recent changes to the Federal Rules of Civil Procedure specifically establish this expectation. There are online self-assessment tools available specifically designed to help you determine where you are at risk. Look for tools that are based on current case law, standards, and best practices for best results. (See [www.arma.org/profiler](http://www.arma.org/profiler))

Evaluate your e-mail management policies. E-mail continues to challenge organizations. With the growth of e-mail, voice-mail, and instant messaging – as well as other electronic records – the capacity for discoverable information has increased. This month, create or review your company's electronic records policies. Pay particular attention to your e-mail retention policies emphasizing retention based on the content of the messages, not the application. For best results, this will be done in collaboration with the rest of the compliance team.

Update and document your policies and procedures. Once you've performed your self-assessment, you should have a good idea as to which policies and procedures need to be developed or updated. There are a number of resources available to help you in this effort, including various standards and guidelines. (See [www.arma.org/bookstore](http://www.arma.org/bookstore)) It's also critical that your policies and procedures are well documented. That's one of the things courts look for: do you have a policy and did you follow it?

Take the time to train: Individual employees play a critical role in helping your organization comply and succeed in litigation, audits, document preservation, and daily records and information management tasks. If you don't have an enterprise-wide training program that is delivered at least annually, now's the time to implement one. One of the expectations put forth in the new federal rules is that all employees are trained on how to appropriately manage electronic information. Securing that information should be part of that training, as well. To make it easier, ARMA International and Kahn Consulting Inc. have produced Keeping Good Company, a DVD-based information management training program complete with facilitator and participant workbooks. It can even be licensed for use on your corporate intranet for easier access and administration. (See [www.arma.org/learningcenter/goodcompany](http://www.arma.org/learningcenter/goodcompany))

Additional resources and information about managing records and information are available from ARMA International at [www.arma.org](http://www.arma.org).

## ARMA International Announces New Executive Director

ARMA International's Board of Directors has named Marilyn Bier the association's new Executive Director. Bier had been the association's Interim Executive Director since March 2006. Prior to that she was the association's Deputy Executive Director and Director of Education, during which time she played a pivotal strategic role in shaping and expanding the association's education program.

Bier joined ARMA International's headquarters staff in 2000, bringing with her an established success record in adult education and leadership. As a member of the association's senior management team for the past six years, Bier has been actively involved in the association's strategic planning discussions and execution, which uniquely qualifies her to assume the helm and keep the association's operations moving forward.

"This is not the same association it was even 5 years ago, and Marilyn has been part of its dramatic evolution these past few years. We believe she has the passion, energy, and enthusiasm for the profession that will help that evolution continue," explains ARMA International President Susan McKinney, CRM. "She understands the changing dynamics of our profession."

Bier's appointment was effective March 6.

### **About ARMA International**

*ARMA International (www.arma.org) is a not-for-profit professional association and the authority on managing records and information. Formed in 1955, ARMA International is the oldest and largest association for the records and information management profession with a current international membership of more than 10,000. It provides education, publications, and information on the efficient maintenance, retrieval, and preservation of vital information created in public and private organizations in all sectors of the economy. It also publishes the award-winning Information Management Journal.*



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