



**An Analysis of
and
Recommendations for
the
State of Montana
Department of Transportation
Information Governance
And
Records Management Program**

The MDT Records Management Project

***“...long-term goal is to develop and implement a comprehensive strategy to ensure all business needs are met while fully complying with all applicable state and federal laws and regulations.*”**

This strategy will ensure that records...are trustworthy (reliable and authentic), complete (including metadata), accessible and readable (including public access) and durable based on the appropriate records retention period as well as permanent archiving.”

The MDT Records Management Project

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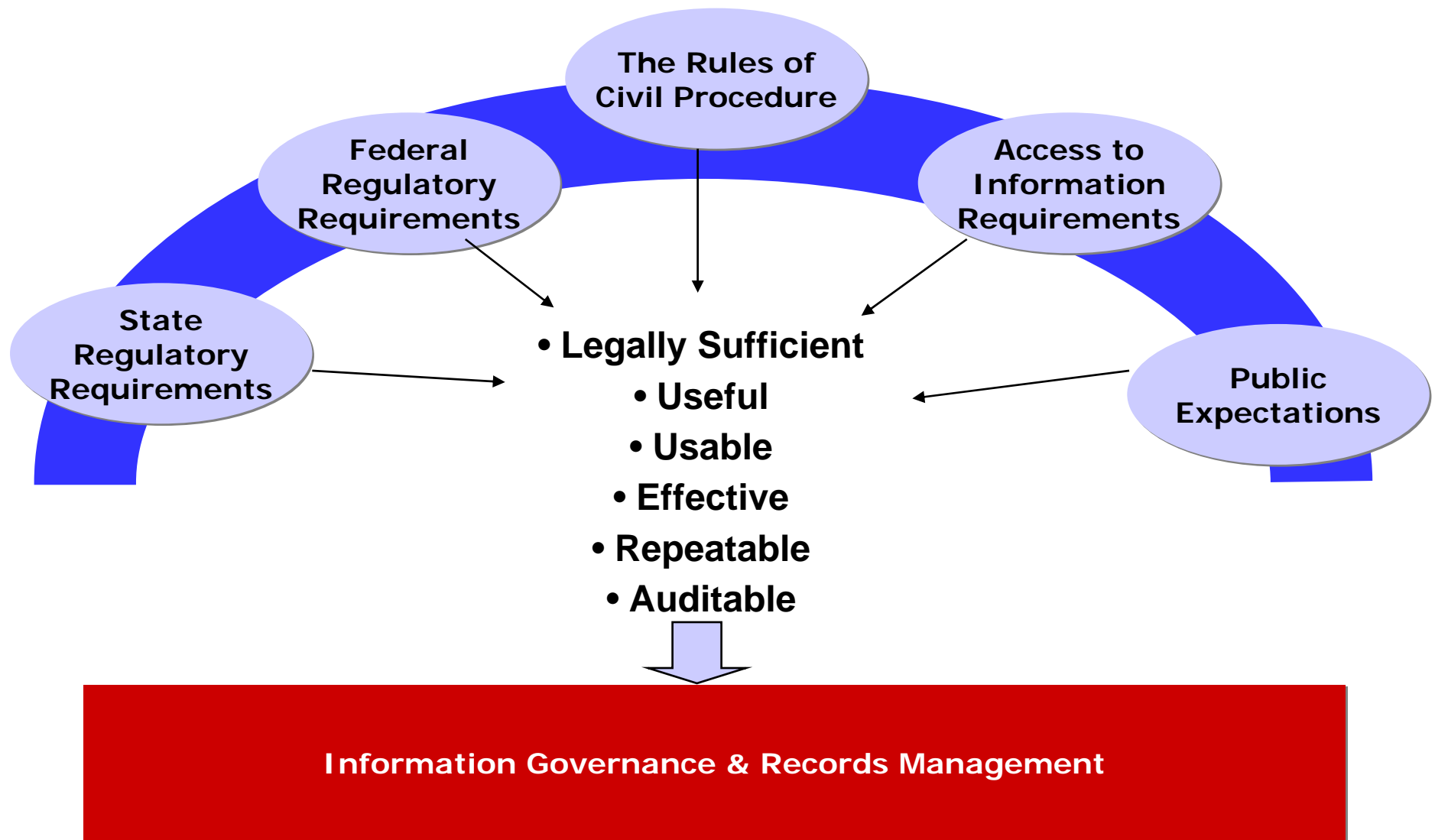
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The MDT Records Management Project

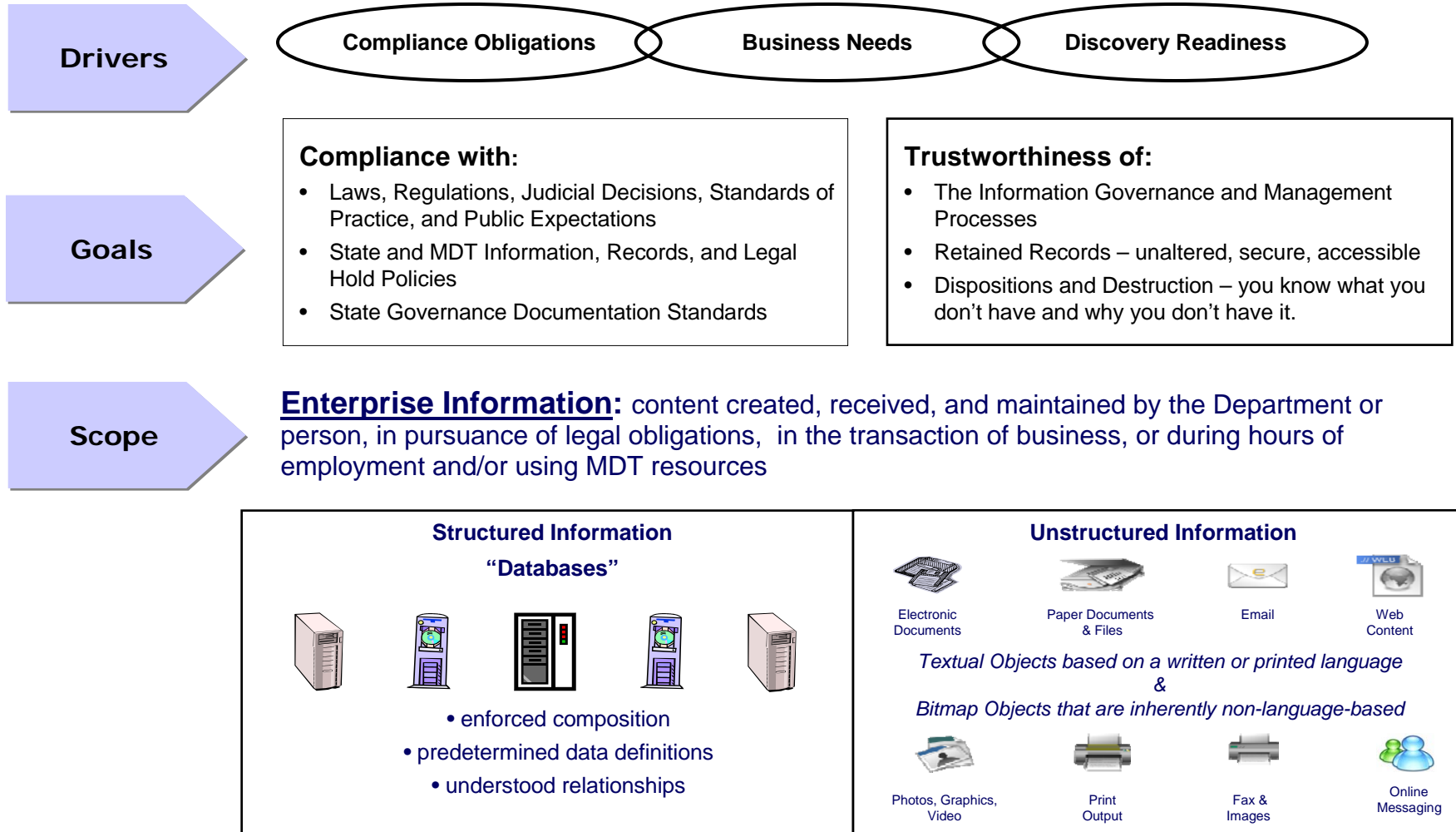
Project Scope:

- **Determine the level of records management awareness and compliance across the organization.**
- **Evaluate records management policies, processes and procedures.**
- **Evaluate records and document management systems and processes.**
- **Identify areas of non-compliance with Department, State, and Federal requirements.**
- **Assess records management program risks.**

Governing and Managing Departmental Information: The Need for Transparency & Accountability



Governing and Managing Departmental Information: A Holistic Point of View

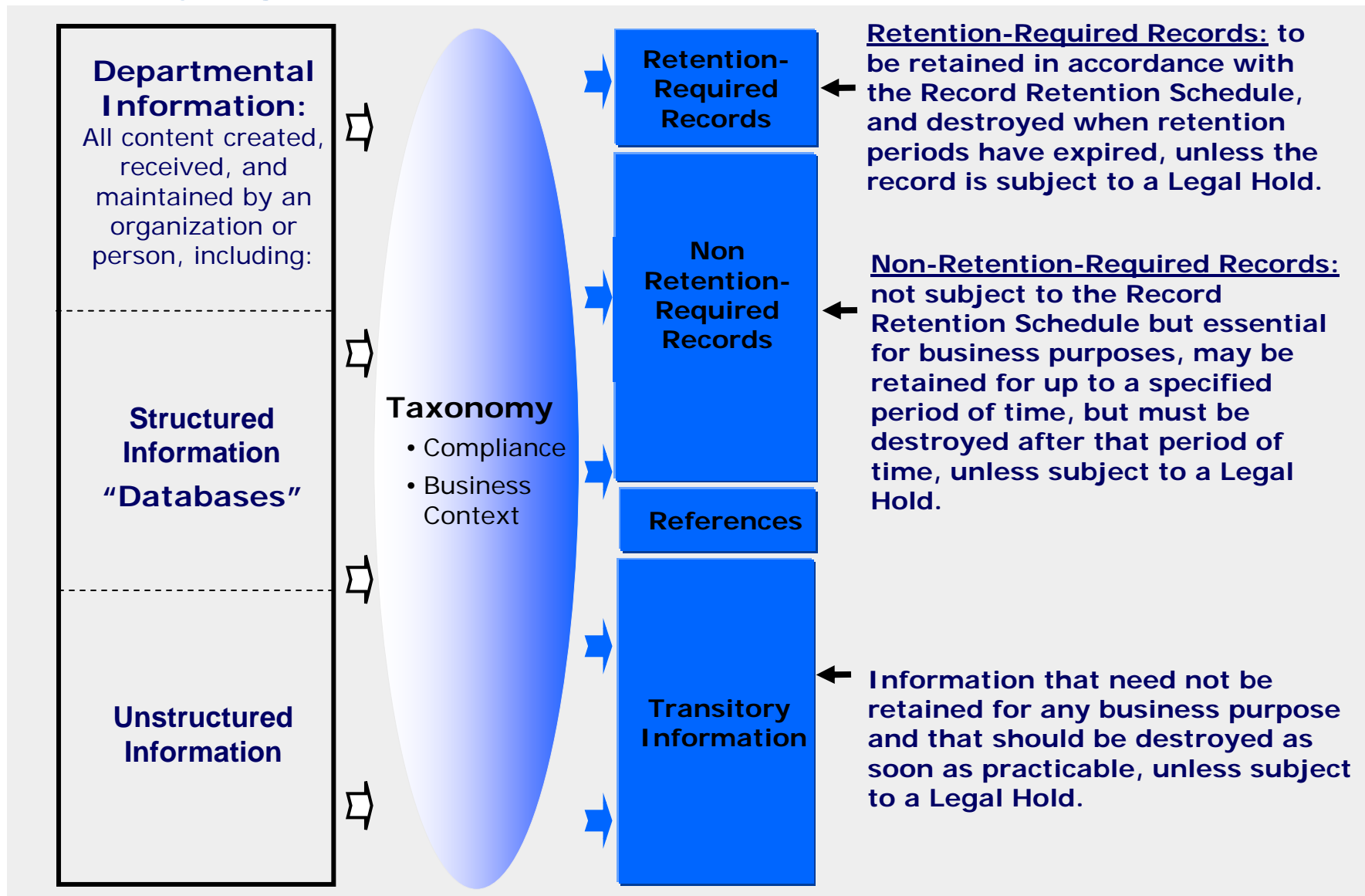


Defining the Terms

- **Information**
 - ✓ **Records**
 - ✓ **Reference Materials**
 - ✓ **Transitory Information**
- **“Public Records”**
- **Information Governance**
- **Records Management**

- Relevant Related Terms:
- **Document Management**
 - **Content Management**
 - **Knowledge Management**

Classifying the MDT 'Stuff'



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The Path Forward: Six Inter-related Perspectives

<ul style="list-style-type: none"> •Policies and program governance 	<ul style="list-style-type: none"> • Corporate information retention & disposition • Executive support and advocacy 	<ul style="list-style-type: none"> • Effective, repeatable, reviewable • Records administration roles and positions • Security and privacy considerations
<ul style="list-style-type: none"> •Processes and procedures 	<ul style="list-style-type: none"> • Implementing related instructions and guidelines • Regular-course-of-business management of information and records 	<ul style="list-style-type: none"> • Monitoring program compliance <ul style="list-style-type: none"> • Benchmark against policies • Enforcement measures
<ul style="list-style-type: none"> •Retention and disposition 	<ul style="list-style-type: none"> • Inventory of all corporate information <ul style="list-style-type: none"> • All types and locations • All media and formats 	<ul style="list-style-type: none"> • Enterprise classification schema • Disposition processes
<ul style="list-style-type: none"> •Legal holds and discovery readiness 	<ul style="list-style-type: none"> • Legal holds & discovery management policies • Discovery lifecycle management • General Counsel processes and responsibilities 	<ul style="list-style-type: none"> • Information technology processes and responsibilities • Workflow and documentation of activities
<ul style="list-style-type: none"> •Technology 	<ul style="list-style-type: none"> • Enable and enhance policy compliance • Coordinated imaging, storage management, and enterprise search solutions 	<ul style="list-style-type: none"> • Consistent solution development methodology <ul style="list-style-type: none"> • Business case and use cases • Architectural and configuration mgmt
<ul style="list-style-type: none"> •Training and communication 	<ul style="list-style-type: none"> • Appropriate training and communication • Business function and position-based training 	<ul style="list-style-type: none"> • Enterprise-wide communication on program benefits and requirements • Emphasis on employee responsibilities

MDT Records Program Assessment Activities

- **Extensive *Request for Information*.**
- **Project Planning Session**
- **Reviewed Federal and State statues and regulations.**
- **Reviewed State and Departmental, directives, policies, and procedures .**
- **Interviewed management and staff from MDT Divisions, Bureaus, and Offices.**

MDT Observations:

- **No centralized listing of MDT recordkeeping and retention requirements**
- **Existing MDT Management Memo concerning records requires update**
- **Physical records in custody of ISD Records Staff are well-managed**
- **Management of physical files and records in MDT Divisions and offices is inconsistent**
- **The MDT Records Manual requires significant update:**
 - **Scope**
 - **Specific guidance**
 - **Enforcement**

MDT Observations:

- **Management and disposition of information and records is not integrated into MDT business processes**
- **MDT information is not consistently classified and identified**
- **There is no consistent naming of electronic files or folders**
- **There is no effective, repeatable, auditable process for disposition of MDT electronically stored information**
- **The MDT Legal Hold process is currently ad hoc**
- **Digital imaging is not widely or consistently used**
- **Email...Oh My!**

The Path Forward:

Statutory And Regulatory Requirements, As Well As MDT Policies Concerning The Receipt, Creation, Maintenance, And Disposition Of Information

- **Authorization, development, and approval processes for the records program**
- **Records Program staff and management structure,**
- **Departmental policy concerning the retention and disposition of all information and records,**
- **Roles and Responsibilities for all Department executives, managers, and employees,**
- **Enforcement requirements.**

The Path Forward:

MDT Processes And Procedures Implementing The Legal And Policy Requirements Concerning Information And Records

Manuals, Guidelines, Operating Procedures, And Similar Documents

- **applicable to all MDT information, or**
- **part of operational guidance specific to divisions,
offices, or work units.**

The Path Forward:

MDT-Specific Retention And Disposition Schedules For Information

- **A structured scheme classifying information into a series of hierarchical groups to make it easier to identify, study, or locate.**
- **File Plans specifying how records are to be organized, in accordance with operational needs and conditions.**
- **information essential for the resumption of operations or the reestablishment of the legal and financial status of the Department identified as “Vital Records.”**
- **Disposition processes clearly delineated.**

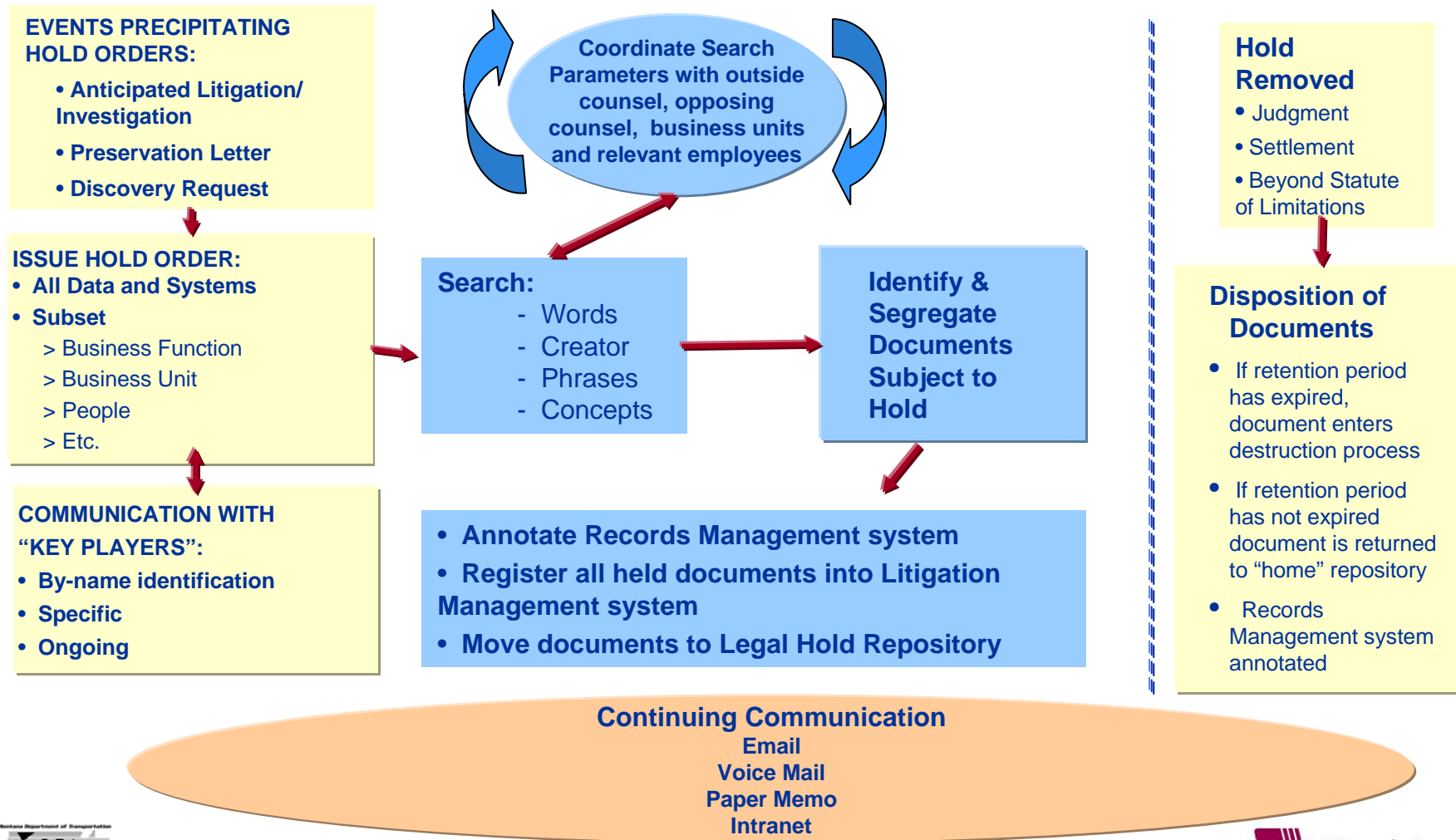
The Path Forward:

Legal Hold And Discovery Management Processes

Processes and systems to corroborate that records and data are identified and safeguarded from alteration or destruction when they are relevant to existing or reasonably anticipated inspection, investigation, or litigation

The Path Forward: Legal Holds

Discovery → Trial → Post Trial → Resolution



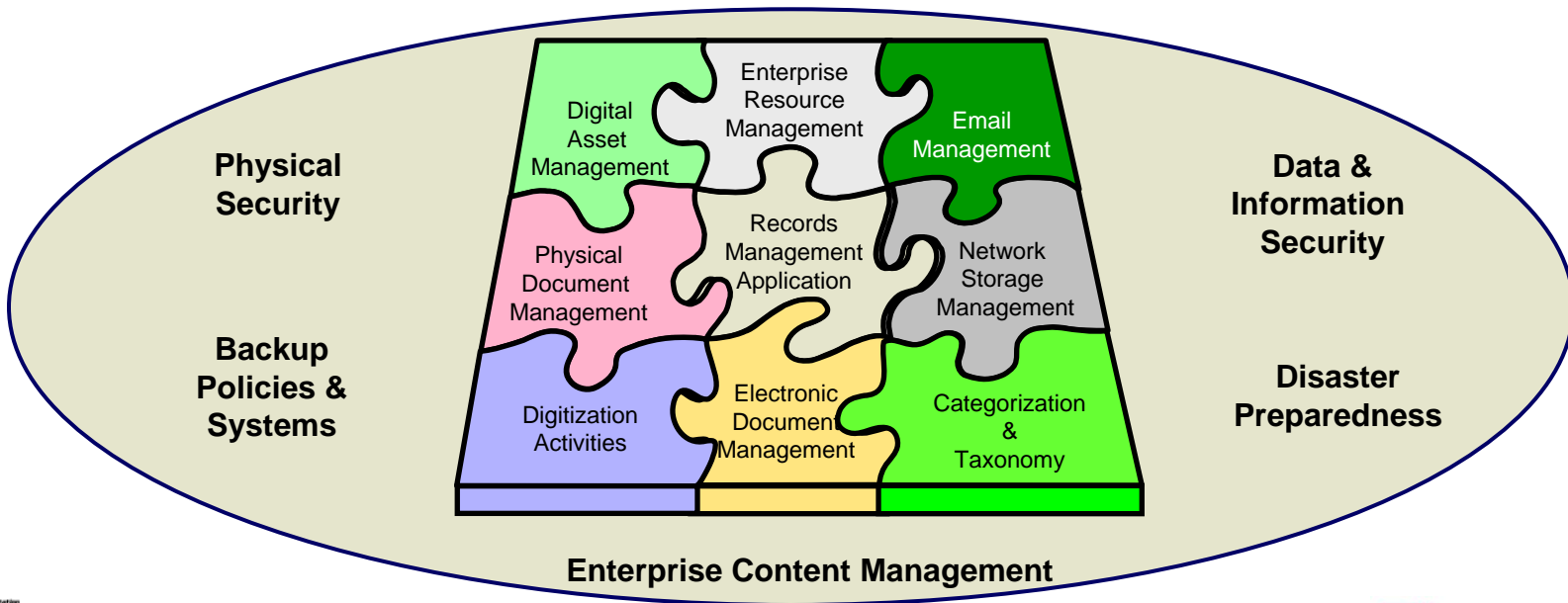
The Path Forward:

Enabling Technologies Concerning Information And Records

- Backup
- Archiving
- Digital Imaging
- Records Management Application (RMA)
- Data Mapping
- Electronic Communications

Governing and Managing Departmental Information: Enabling Technologies

- Information Governance establishes the business needs which become the functional specifications for the systems and applications which position technology to support and empower trustworthiness and compliance of Department information.
- Throughout the various lifecycles of Department information, as related to both use and location, there are numerous processes and technology systems that enable organization, categorization, and management:



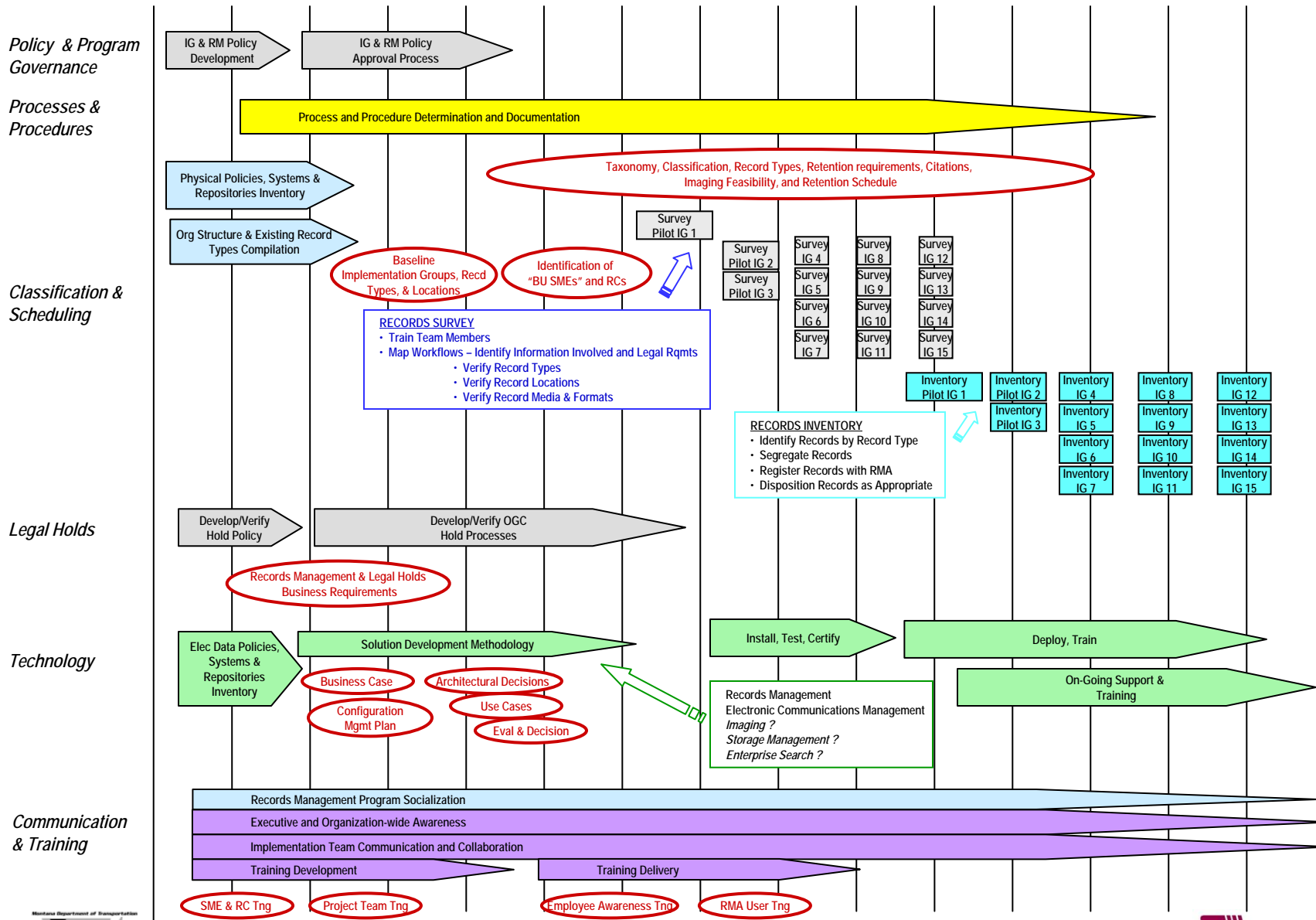
The Path Forward:

Training And Communication Concerning MDT Information Governance And Records Management

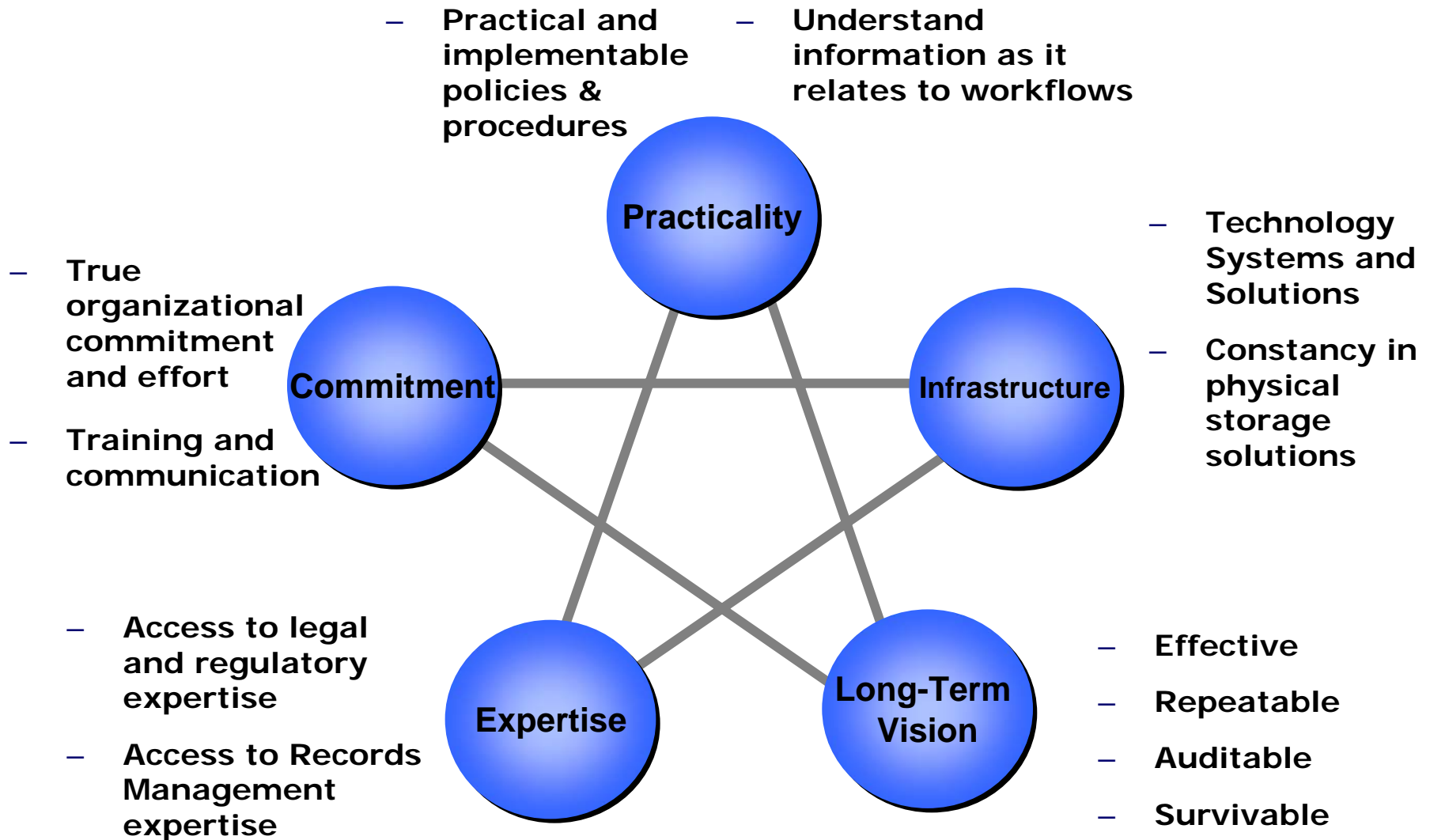
Ensuring that all MDT employees are:

- knowledgeable about the Records Management Program;
- knowledgeable about the potential existence of Legal Holds and how to react when they are notified about a Legal Hold;
- in compliance with the Records Management Program;
- in compliance with applicable Legal Holds; and
- in compliance with self-certification requirements.

Records Management Program Implementation Activities & Deliverables



Critical Success Factors



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