Please read the business case that was given to the candidate.

The goal of this business case is to evaluate the candidate's proficiency in developing a business case. The candidate is asked to write a clear, well-organized business case using a narrative format appropriate for the designated audience. The business case may contain lists, as often used in presentations to management. However, if lists are used, the candidate must devote a paragraph to explain why the actions are appropriate. The answer may not consist only of lists. The business case should explain the underlying problems found and recommend solutions to these problems. The candidate has been told penalty points may be levied by graders for incorrect format, poor grammar, poor spelling, and/or poor organization of the answer.

The candidate MUST introduce the report with an Executive Summary. The Executive Summary should contain 2-3 paragraphs explaining the basic overall problem(s) identified, the key issues or factors to be resolved in order to achieve the final result, and a high level description of the recommended outcome. Following the Executive Summary, the business case analysis should describe the specific issues found and the suggested recommendations.

The candidate is expected to state any facts that are assumed in developing the business case and should logically support the answer. Topics not specifically mentioned may be included in the business case and are acceptable so long as they are considered relevant and well explained.

Specific Points:

The candidate is instructed to introduce the business case with an Executive Summary, followed by the Analysis section consisting of several specific sections. Each of the following parts should be graded and weighted as follows:

I. Executive Summary: 10 points maximum

This section serves as the introduction to the business case. The candidate has been instructed to identify key issues or factors to be resolved in order to achieve the final
result, along with a high level description of the recommended outcome in no more than 2-3 paragraphs. Specific recommendations to resolve the problem should not be listed in this summary. No extra credit is awarded for this section. A sample Executive Summary for this Business Case would be:

"Pegmatite Transportation Systems does not have a functional RIM program. The former records manager apparently did not do the work she was asked to do and successfully kept that fact hidden from the company until the company was sued. There was a lack of oversight by management and legal counsel that helped cover for her incompetence. Because there was a lack of proper oversight and follow up, inconsistent RIM practices exist throughout the company’s locations.

Pegmatite needs to develop a basic RIM program to address the problems that remain from the tenure of the former records manager. The program should include policies, procedures, best practices, communications, training, periodic audits, and litigation preparedness. With a well-managed and well-promoted RIM program, Pegmatite can reduce its legal and regulatory compliance risk exposure."

II. Analysis: 40 points maximum

This section should deal with the specific problems and issues discovered during your review of the Findings. Your proposal should include identification of the problems and recommendations.

A. Identification of the Problems 15 points total

Identify the various challenges seen in the business case and why they are considered RIM Issues. The candidate may include some of the following examples or think of others on their own. The grader has the flexibility to decide relevance on issues listed that do not appear as an example. Possible issues include:

- Lack of company-wide RIM policies and procedures – This leads to inconsistent practices for managing records across the company. While the company appears to have successfully dodged any major RIM-related problems for a long period of time, the tanker litigation discovery process showed the flaws in the system.

- Training – There appears to be no RIM training program for employees within Pegmatite. The absence of training is exacerbated by the lack of RIM policies and procedures and encourages employees to conduct business without the knowledge of RIM best practices or an awareness of the need for regulatory compliance.
• Retention schedule – The data for the retention schedule was gathered through the questionnaire method, which is a less-reliable method for inventorying records. Employees not properly trained in RIM may not answer the questions correctly or fully, or may not return completed questionnaires. If any data was gathered by the former records manager, it was not translated to fully account for all for the record types. The schedule that was created did not appear to properly appraise the value of the records and assign appropriate retention periods based on business needs, historical value, or legal research. The retention schedule did not appear to have received legal or management approval. No copies were distributed for use throughout the company. The company is at risk for not retaining records for the appropriate amount of time and for retaining records beyond what a properly researched and approved retention schedule would have mandated.

• Staff qualifications for headquarters RIM functions are lacking - The person chosen to fill the position of company records manager did not have the skill set needed to perform the job. It could be assumed that just because she was a file clerk, she did not understand or did not care to undertake the process for fully inventorying and scheduling records, developing RIM policies and procedures, and educating the employees in RIM.

• Lack of oversight and accountability for the RIM activities of the former records manager - Management failed to ensure that the work done by the former records manager was complete and legally defensible. This put the company at increased risk during litigation and regulatory actions.

• Lack of communication within the company – Examples of the lack of communication are:
  ○ The retention schedule was never reviewed or approved by management or by legal counsel;
  ○ The retention schedule was never distributed or implemented across the company and nobody questioned its absence;
  ○ Nobody appeared to have noticed the lack of effort and progress in the RIM program until there was litigation;
  ○ Some company locations were able to perform a passable job with RIM while others performed poorly. Best practices were not shared between locations.

• No apparent formal litigation preparedness plan for records –The company did not have a process in place to prepare for, and respond to, litigation. The inefficiencies in the
RIM program did not become apparent until there was a legal action. Legal counsel, who should have been involved in the review and approval of the retention schedule, did not recognize the inadequacy of the schedule written by the former records manager until the litigation occurred. The office manager in the regional office with jurisdiction over the accident location was unfamiliar with the responsibilities of organizing and maintaining files and how to respond appropriately during legal discovery.

B. Recommendations  
25 points total

The grader is granted flexibility to evaluate the proposed items and their relative placement in the timeline, so long as the candidate’s response demonstrates a logical understanding of the problem and provides explanations for each recommendation. The following are possible recommendations for the organization:

Policy, Procedures, and Processes:

• Establish the basics of a RIM program through policies and procedures.
  o Inventory all of the records across the company.
  o Develop a retention schedule that has been appropriately reviewed and approved by legal counsel and management.
  o Create a company-wide file plan/taxonomy.

• Develop a RIM page on the company’s intranet site linking to the record schedule and file plan/taxonomy. Online access and training for employees will foster an awareness and accountability across the company for the RIM program. Dissemination of RIM best practices, policies, and procedures through communication and change management will help decrease hostility and defensiveness over the management of records.

• Initiate a records organization and clean-up program throughout the company based on the organizational structure of the file plan/taxonomy and the retention periods in the retention schedule. Ensure that both paper and electronic records are addressed during the clean-up program.

• Establish best practices for records stored onsite and offsite for all company locations (inventory control, retention, organization, etc.) This will assist during legal discovery.
• Establish with the Vice President of Operations what kind of metrics and reporting need to be provided by the RIM program to show accomplishments, progress, and accountability.

• Investigate technological solutions that can be applied company-wide to facilitate consistent RIM practices. Investigate how to apply indexing principles to all records regardless of media. Perform a cost/benefit analysis to determine the value of scanning and uploading paper records and other electronic records into a content management system that can be accessed regardless of location for business or litigation preparation purposes.

• Establish a routine audit process for the RIM program to ensure that the policies and procedures are being followed, regardless of location.

• Establish a routine review of transportation regulations to ensure that Pegmatite’s RIM program remains compliant with applicable regulations.

• Develop a litigation readiness program in conjunction with legal counsel. Include procedures for legal holds and designation of roles and responsibilities.

Training:

• Historically, RIM practices varied widely within the company. In order to help unify and standardize the practices developed by professional records management staff across the company, employees should receive comprehensive RIM training to educate them in the basics of RIM. This training should include how the company expects their records to be maintained and how technology can be incorporated into business processes addresses RIM issues. In addition, the training should include specific topics, such as how to prepare for litigation or compliance audits. These activities would need to be sponsored by the executives and promoted with the support of strong policies and procedures.

• Because there are many work sites within the company, Pegmatite should evaluate the use of online training to ensure that employees receive the same training regardless of location.

Staffing:

• Analyze the company’s locations and processes to determine the appropriate number of RIM staff needed. In a company with ten thousand employees located throughout the country, one RIM Director stationed at the company headquarters is not enough to ensure RIM best practices, policies, and procedures will be followed.
Consider the use of trained records coordinators throughout the company to assist the professional staff with RIM tasks.

- Hire RIM staff with the appropriate background. Develop position descriptions and RIM competency standards for hiring future RIM staff to ensuring they have the background and skill set needed to carry out the requirements of the RIM program.