AUDITING THE RECORDS MANAGEMENT PROGRAM

Virginia Association of Government Archives & Records Administrators
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What is a Records Audit

A process to insure your organization follows:

• Internal Practices and Procedures
• Meets Regulatory Criteria
• Legal Defensible Recordkeeping
What can require an Audit?

Sampling of present day laws

Government Entities - State & Federal Laws
The Virginia Public Records Act: § 42.1-90.1. Auditing

Not for Profit Organizations - State & Federal Law
Statute and Description: Va. Code Ann. § 58.1-609.11(C)(4)

Corporate Organizations - State & Federal Law
Who can require an Audit?

Government Entities in the State of Virginia

The Virginia Public Records Act:
§ 42.1-90.1. Auditing.
The Librarian may, in his discretion, conduct an audit of the records management practices of any agency. Any agency subject to the audit shall cooperate and provide the Library with any records or assistance that it requests. The Librarian shall compile a written summary of the findings of the audit and any actions necessary to bring the agency into compliance with this chapter. The summary shall be a public record, and shall be made available to the agency subject to the audit, the Governor, and the chairmen of the House and Senate Committees on General Laws and the House Appropriations and Senate Finance Committees of the General Assembly.
Types of Audit

Internal Audit

Internal auditors work within an organization and report to its audit committee and/or directors.

External Audit

External auditors are independent of the organization they are auditing. They report to organizational management, stockholders or clients who require the audit.
An Audit can encompass
An Area or an Entire Entity

SYSTEMS - Policies & Procedures; Records (hardcopy, microfilm Microfiche, etc.)

TECHNOLOGIES – Records (Information Systems (IS); Imaging; Geographical Information Systems (GIS); Industrial Related

FACILITIES – Internal and Offsite
Sample Cycle of an Audit

• Identification of areas(s) to review
• Standards & Criteria are set for the Audit
  * Identification of systems that process data for the program
  * Determination of Compliance Requirements
  * For each Compliance, Determine control objectives
• Measurement of the Current Practice
• Comparison of Results to the present standards
• Communication of the Final Results
• Plan Changes and Future Implementation
• Sustaining Improvements
What does the Records Manager need for an Audit?

- Management support & compliance
- Review & understand the organizations policies & procedures
- Understand the types of audit the organization can face
- Review of Records Management Policies, Procedures & Personnel Training
- Knowledge of Legal Issues and Compliance
- Resources for the Audit are available, efficient and effective
- A check list of what may be covered to review the area(s)
Basic Records Audit Checklist

- Organizational structure chart
- Documentation of staff job descriptions
- Mission statements of the organization & records management
- Records Management Policies & Procedures
- Retention Schedules
- Access Authorizations
- Specifications for records storage facilities, shelving, etc.
- Digital Records specifications for records management
- Disaster Recovery
- Inventory of Vital Records
- Audit Trail
- Business continuity Plan
- Agreements with outside contractors
- Documentation for microfilm, fiche, imaging, etc.
- Destruction Lists
- Information regarding any outside storage facility that maintains the organizations information (hard copy, microform(s), digital, cloud, etc.)
Auditing Electronic Records
Sample Listing of Good Practice Measures

• Documented procedures and instructions
• Staff awareness & Training
• Data Capture & Indexing
• Authentication of records and copies
• Data file transmission
• Date & time stamps
• Information retention & destruction
• Input & checking of data by additional individuals

• Self modifying files
• Workflow
• Version Control
• Maintenance of Documentation
• System Maintenance, Security & Protection
• Voice, audio, video data, etc.
• Templates, overlays, presentations, etc.
• Use of contracted services
### Sample Audit Checklist

#### INTERNAL AUDIT CHECKLIST

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<thead>
<tr>
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<tbody>
<tr>
<td><em>7.23a</em></td>
<td><em>7.23b</em></td>
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<td>Determine and implement arrangements for communicating product information, handling inquiries, orders and changes.</td>
<td>Are processes for communicating with customers adequately defined to include pooling, assignment of authorities and responsibilities, and methods (procedures, instructions, training)? Are these processes consistently implemented? Verify that product brochures and specifications and other product information (including the Internet site) are current.</td>
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#### Product Realization Process PRP 02 – Purchasing

<table>
<thead>
<tr>
<th>ISO 9001</th>
<th>Requirements</th>
<th>What to look for and how</th>
<th>Comply</th>
<th>Auditor notes and evidence</th>
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<tr>
<td>7.4.1</td>
<td>Control suppliers and the purchased product to ensure that the product conforms to specified purchase requirements.</td>
<td>How are suppliers controlled? Initial selection evaluations, ongoing monitoring, audits of suppliers’ QMS and/or manufacturing processes, requests for corrective actions?</td>
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<td>7.4.1</td>
<td>Evaluate and select suppliers based on their ability to supply products conforming to specified requirements. Establish evaluation and selection criteria. Maintain records of supplier evaluation and related actions.</td>
<td>Are suppliers evaluated and reviewed before they are approved? What are the scope, extent and criteria for evaluating and approving suppliers? Who decides? How is the approval documented? Are there records of initial supplier evaluations? Select randomly and review a sample of supplier evaluation and monitoring files.</td>
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<td>7.4.2</td>
<td>In purchasing specifications include, where appropriate: requirements for approval of product, procedures, processes and equipment; requirements for approval of personnel; and quality management system requirements.</td>
<td>Where appropriate, are there requirements for certificates, inspection reports, SPC data, approval of samples, etc., included in purchasing documents? Are there any requirements with regard to supplier’s quality management system?</td>
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<tr>
<td>7.4.2</td>
<td>Ensure adequacy of purchasing specifications before they are forwarded to suppliers.</td>
<td>How is adequacy of purchasing documents ensured? Are the documents reviewed before release? Are there standard, pre-approved specifications in the system? What other methods are used? Can you uncover any past problems caused by errors or omissions in purchasing documents?</td>
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Sample Page ISO 9001 and Gap Analysis Checklist (ISO Express Example)

https://www.isoxp.com/10Products/ChkList90pkg.aspx
HELPFUL TOOLS
ISO 15489
International Standard on Records Management

• Standard started in 2001 at the ARMA International Conference, Montreal, developed by an international committee
• Purpose was to establish generic recordkeeping standards for government and non-government entities
• ISO 15489 Part 1 - General (Framework for records keeping)
• ISO 15489 Part 2 – Guidelines (Development of good Records Management policies, procedures, processes, controls, etc.)
The principles of information governance, known as the Generally Accepted Recordkeeping Principles® (the Principles), are grounded in practical experience and based on extensive consideration and analysis of legal doctrine and information theory, form the basis upon which every effective information governance program is built, measured, and – regardless of whether or not an organization or its personnel are aware of them – will one day be judged. ARMA International developed and published the Principles to foster general awareness of information governance standards and principles and to assist organizations in developing information management systems that comply with them.

If you are interested in learning more, listed below are The Principles in their entirety and education to get you started:

- [The Principles](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles) (PDF)
- [French translation](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles) (PDF)
- [Maturity Model](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles) (PDF)
- [The Principles Education](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles)

**Other resources:**

- [Next Level](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles) (Product that uses The Principles)
- [The Principles Citation and Copyright Information](http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles)

If you have questions regarding The Principles, please contact Diane Carlisle.

http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles
Why Audit Outside Storage

Organizational Risks
Cost
Compliance
Legal Issues
Disaster Recovery
Audit of Outside Storage Facilities

**Facility Construction & Location**
- Is it in a non-hazardous area, well constructed to standards?

**Facility Security**
- Alarms; Personnel Checks; Doors & Locks; Indexing & Tracking system of Records; Anti-intrusion plans?

**Environmental Controls**
- Temperature; Humidity; Cleanliness; Records exposure?

**Shelving & Racking (hardcopy/tapes, etc.)**
- OSHA Standards; Non-combustionable shelving; floor braced for heavy loads?
Audit of
Outside Storage Facilities

Fire Protection
• Fire alarm system; Firewalls; Sprinkler system; Fire Extinguishers; No hazardous materials in Records Storage areas.

Disaster Recovery
• Emergency Plan?
• Salvage Priorities?
• Emergency Recovery Service Companies?
• In the case of Microforms or Digital Media are they backed up?

Facility Storage, Cost & Destruction of Records
• Cost effective storage; Meeting your organization agreement regarding audit trail of storage/retrieval & destruction?
Outcomes from an Audit

• Your organization is reintroduced to its goals, responsibilities and services
• It shows unknown inefficiencies that may exist
• Allows the organization to review what has worked and what has not
• It allows for new strategy and direction

“If you can’t measure it-You can’t manage it”  Peter Drucker
“In God we trust; all others must bring data.”

W. Edwards Demming

The Elements of Statistical Learning
(Preface to the 2nd Edition)
(Trevor Hastie, Robert Tibshirani, & Jerome Friedman)