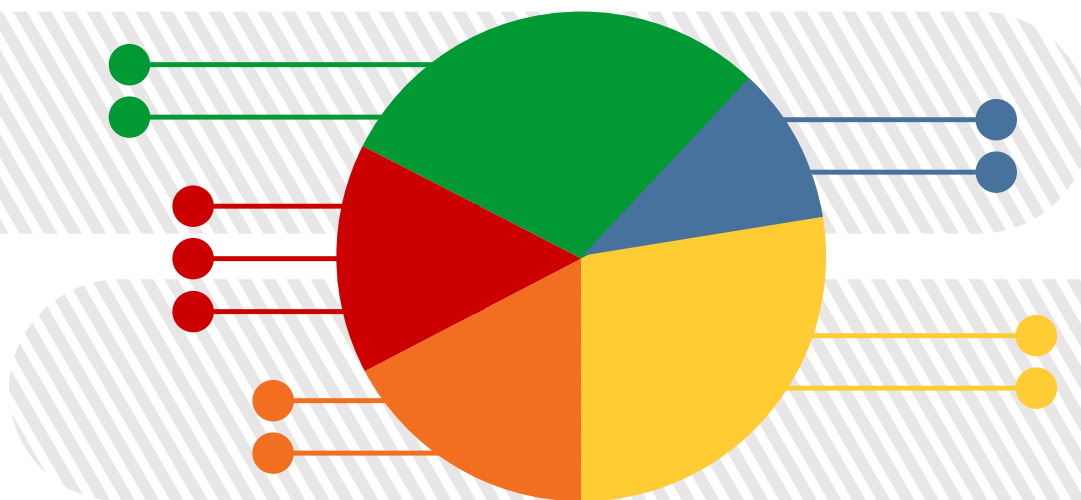


# Information Lifecycle Governance Requirements Kit



Solution Design Criteria for Level 4 Maturity

## Introduction

Understanding the organization's maturity level as defined in the CGOC Information Economics Process Assessment Kit — is a major step forward in the journey toward achieving real information economic balance. The next is defining the requirements for a robust information lifecycle governance (ILG) solution and any gaps that may exist between currently deployed tools/processes and what's necessary in getting to the desired end state. The nature and interdependencies of ILG necessitate a comprehensive approach that considers each of the stakeholder communities and the level of cross functional processes/systems that need to be better integrated.

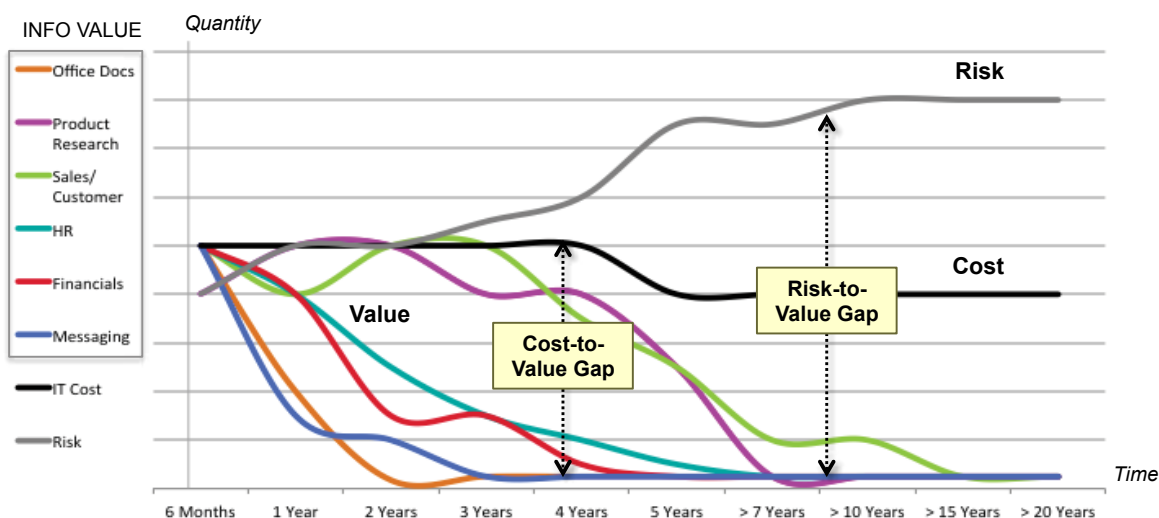
The Information Lifecycle Governance Requirements Kit includes a set of high-level requirements for use in understanding and evaluating an ILG solution by identifying the capabilities required to achieve Level 3/4 maturity. They can also be leveraged in aiding the creation of requests for information or proposal (RFI/RFP) allowing for vendor comparisons of features/functionality against other offerings. Requirements are segmented by process and provide suggestions for logging responses and scoring them for use in the evaluation/selection of software tools.

## ILG Solution Design Requires Holistic Approach

The information lifecycle includes critical inflection points important to improving the underlying economics of creating, storing, preserving and disposing of information. An organization's maturity in Information Lifecycle Governance for actively managing the lifecycle and addressing these points has dramatic affect in realizing informational value while reducing cost and risk.

Improving information economics is achieved by addressing each of these points:

1. Realize the value of information as context erodes over time
2. Align the cost of storing/preserving information with its value as it declines
3. Eliminate cost when information has no value after it's been fully depreciated



The volume, velocity and variety of new information assets being created and stored along with the cost and risk associated with it has caused organizations to recognize the need to improve information economics through lifecycle governance and the ability to dispose of digital debris in a defensible manner. Doing so requires optimizing across the eighteen processes that enable the capability with benefits accruing to key stakeholders to:



Leverage information for better decisions

Don't waste budget on unnecessary IT or legal services



Meet e-discovery obligations cost effectively and efficiently for the enterprise

Manage conflicting privacy and regulatory duties

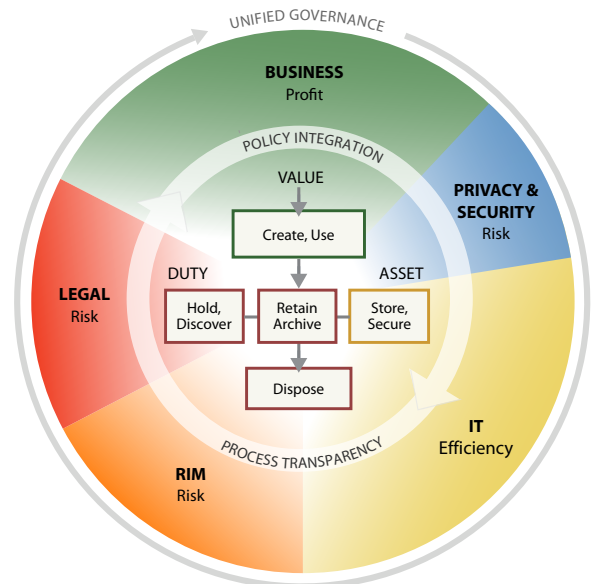


Minimize "run the shop" costs to increase investment in "grow the firm" activities

Cut total costs even as total volume rises

Getting to the highest level of maturity and capability requires a closed loop between the supply and demand side of information, aligning cost with value over time and limiting or removing risk altogether. Designing and implementing a solution to meet the business imperative for a maturity level providing consistent and repeatable information management processes, which are accessible across stakeholder groups is critically important.

An ILG solution linking stakeholder needs, creating transparency and automating processes delivers tangible benefits to the organization resulting in cost and risk reduction and better decision support through improved data quality. It establishes the foundation for an efficient information economy.



Information Governance Reference Model / © 2012 / v3.0 / edrm.net

## Getting Started

The set of requirements defined in the following table is designed to provide the basis for analyzing the current state of information governance tools/processes against what's required for Level 4 maturity. Gaps can then be identified to determine additional capabilities needed and the requirements leveraged as a basis for gathering and evaluating information from software providers in designing the solution. This is intended to augment the activity of defining an ILG program and understand the capabilities needed in the technical solution, not necessarily to be an exhaustive set of requirements as organizational demands do vary. The Information Lifecycle Governance Requirements Kit does provide the ability to take the next key step in determining the tools and integration needed for an effective solution.

# Information Lifecycle Governance Solution Requirements

## FUNCTIONALITY NEEDED TO ACHIEVE LEVEL 4 MATURITY

Process		Description	Risks/Consequences	RQMT #
A	Employees on Legal Holds	Determine employee(s) with information potentially relevant to an actual or anticipated lawsuit or government investigation	Custodians (end users) are not identified and potentially relevant information is inadvertently modified or deleted	A.1
				A.2
				A.3
				A.4
				A.5
				A.6
				A.7
B	Data on Legal Hold	Determining information records and data sources potentially relevant to an actual or anticipated lawsuit or government investigation	Actual, rogue or IT managed data sources missed in hold execution. Potentially relevant information is inadvertently modified or deleted	B.1
				B.2
				B.3
				B.4
				B.5
				B.6



F = Fully Satisfies Requirement. 3rd party tools are not necessary  
P = Partially Satisfies Requirement. Feature/function meets part of the requirement and/or vendor leverages a 3rd party tool.  
N = Requirement NOT met

Vendor Response			
Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Solution shall provide real-time updates for custodians: - Roles - Transitions - Responsibilities			
Solution shall include automatic updates of employee transition by attorney and matter			
Issuance of transition alerts by attorney and matter shall be automatic in the solution			
Custodian lists shall be copied or cross referenced across similar matters			
Solution shall allow setup/configuration of time-based follow up to re-visit/refine scope - User defined, e.g. quarterly, monthly, weekly - Allow release or inclusion of custodians			
Interview responses shall be propogated by individual to hold scope within the solution			
Interview results shall be capable of being shared with identified outside counsel - Results shared shall be tracked by recipient			
Solution shall provide automatic scoping of data on hold: - People - Systems - Production data - Backup data - Information & records in holds			
Terminated employee data and legacy data/tapes shall be included AND maintained within scope			
Alerts/notices to follow up to re-visit/refine scope shall be time-based - User defined, e.g. quarterly, monthly, weekly - Allow release or inclusion of data			
Solution shall scope directly from data source catalog - Share with identified/selected data quality stakeholders, e.g. business, IT, information security, records, etc.			
Schedule for IT interviews shall be defined in two dimensions - Periodic/recurring - In matter context			
Interview responses shall be aggregated for individual matters AND across legal team			

Process		Description	Risks/Consequences	RQMT #
C	Hold Publication	Communicate, syndicate and execute legal holds for people, systems and data sources for execution and compliance	IT or employees migrate, retire or modify subject data because they lacked visibility to holds	C.1
				C.2
				C.3
				C.4
				C.5
				C.6
				C.7
				C.8
				C.9
				C.10
				C.11
D	Evidence Collection	<p>Fact finding and inquiry with employees with knowledge of a matter in dispute to determine potentially relevant information, its whereabouts and sources.</p> <p>Collecting potential evidence in response to an agreed-upon request with an adversary or government agency.</p>	<p>Dynamic, diverse information facts not considered in preservation and collection planning, i.e. data is overlooked. No follow through on information identified in custodian interviews.</p> <ul style="list-style-type: none"> <li>- Collection failure from overlooked source, departing employee</li> <li>- Incomplete prior collection inventory</li> <li>- Communication and tracking errors</li> </ul>	D.1
				D.2
				D.3
				D.4
				D.5
				D.6
				D.7
				D.8
				D.9
				D.10
				D.11
				D.12



Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
System shall generate HOLD notifications and recurring reminders			
Confirmations shall be required and tracked			
Solution shall provide the ability to manage exceptions			
Employees shall have online access to review their holds			
Communications shall be tailorable to recipient role. - IT, RIM, Legal, Employee			
Solution shall publish hold information to system and propagate to identified entities; people, systems, data sources			
Enforcement of Holds shall be automated.			
System interface to IT shall provide continuous visibility - Current discovery duties - Holds in effect during routine data management activities			
Automated identification/flagging of records in appropriate systems shall be provided			
Solution shall provide timely release of holds			
Release notifications shall be syndicated. - Follow same rigor as process for syndicating holds.			
Solution shall provide a log of collection requests that can be classified by: - Matter - Issuer - Collector			
Shared system shall allow collection logging by authenticated discovery staff			
Managed evidence inventory with proper access controls for adds, changes, deletes			
Evidence inventory included in scoping other matters - Ensure data is not overlooked			
Includes interview results/insights to inform collection activity			
Interview results automatically included in specific collection instructions for custodians and data sources			
Shall provide IT and/or collection staff automated collection by custodian and content. - Re-logging the request or re-collecting the same data shall not be required.			
Collection data and chain of custody shall be automatically logged.			
Shared interface and complete transparency is provided to IT and Legal. - Ability to monitor progress and process available to Legal users - IT has capability to process work by custodian and/or data source efficiently			
Browser interface shall enable precise collection directly from custodians and systems by Legal staff			
Duplicates of evidence shall be prevented from being stored in multiple locations			
Timely disposal of evidence shall be provided to authorized Legal/IT staff			

Process		Description	Risks/Consequences	RQMT #
E	Evidence Analysis & Cost Controls	Assessing information to understand dispute and potential information sources and for determining, controlling and communicating the costs of outside review of relevant information	Material issues in dispute are poorly understood until after strategy established and expenses incurred. Excessive data causes litigation costs to exceed dispute value.	E.1
				E.2
				E.3
				E.4
				E.5
				E.6
				E.7
				E.8
F	Legal Record	Documenting the custodians and data sources identified, the legal hold and collection activities over a multi-year matter.	Inability to readily assemble, understand or defend preservation and data source management. Preservation, collection detected long after occurrence and cause unnecessary remediation cost and risk.	F.1
				F.2
				F.3
				F.4
				F.5
				F.6








Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Solution shall allow for tight scoping of custodians to optimize the quantity of data reviewed. - Prior scoping histories shall be included in current scoping activities			
Consistent and enforced culling shall be performed utilizing objective criteria such as: - Keywords - Date range(s) - File types - Domain names - Data sources - Custom criteria			
Forecasts of discovery cost shall be calculated continuously and available throughout the Hold scoping process			
Scope of collections and review shall be limited on a consistent basis			
Solution shall provide process for early case assessment prior to collection - Allows for earliest/optimized case resolution			
Advanced culling techniques shall leverage visual analytics			
Process for providing outside counsel early case assessment before processing shall be defined and repeatable			
Cost shall be managed at the portfolio level			
Reminders and escalations shall be generated and distributed to required individuals and/or groups			
Solution shall provide on-line access to audit trail detail			
Management reports shall be available for preview and/or printing based on discovery status			
Interface shall provide legal department visibility across - Custodians - Collected inventory - Matters			
Solution shall provide real-time visibility across identified stake holder groups - IT - Legal - Business - Other (Custom)			
Self-service dashboards shall be provided for - Legal obligations - Tasks - Risk - Cost reduction opportunities			

Process	Description	Risks/Consequences	RQMT #
 <b>RIM</b>  <b>G</b>	<b>Master Retention Schedule &amp; Taxonomy</b>	Defining an information classification schema that reflects the organization structure; cataloging, updating, and mapping the laws that apply to each class in the countries in which the organization operates to determine regulatory record keeping obligations; establishing and managing a network of records liaisons to help establish what records may exist where. Potential separate process for Records Management: Managing physical and electronic records including their identification, retention and timely disposition.	G.1
			G.2
			G.3
			G.4
			G.5
			G.6
			G.7
			G.8
			G.9
 <b>BUSINESS</b>  <b>H</b>	<b>Departmental Information Practices</b>	Using an enterprise information taxonomy, cataloging which information each business organization values, generates or stores by class, where they store it and how long it has utility to them; results in retention schedules for information and enables data source-specific retention schedules that reflect both business value and regulatory requirements.	H.1
			H.2
			H.3
			H.4
			H.5
			H.6
			H.7
			H.8

Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Solution shall provide the ability to establish a retention period for - Regulated information - Information important from a policy perspective			
Capability to map actual laws dictating retention periods to each record class shall be provided - Allows law changes to be easily traced - Delivers easier defense of decisions based on law			
Solution shall enable electronic and physical records to be sequestered			
Retention and disposal of electronic and physical records shall be based on the records schedule			
Retention schedules shall be capable of encompassing all information reflecting requirements for - Regulations - Policy - Business value			
Legal holds shall be applied by record class and suspending automated disposal			
Solution shall provide a shared library of country-specific protocols enabling a comprehensive view across - eDiscovery - Privacy - Retention			
Retention schedules shall be aligned across countries			
Systematic disposal shall be based on retention schedules for specified data types - Production & Backup - Structured & Unstructured - Electronic & Physical - Record - Business Information			
Solution shall enable departmental liaisons within a line of business to - Identify information of value - Duration of value - Location where it is managed			
Comprehensive retention schedules shall use parameters from above requirement for all information - Regulated, unregulated, electronic, physical			
Business unit shall be able to request and implement timely changes to retention schedules - Master schedule - Department/country schedules			
Retention schedules shall be automatically executed across the information environment			
Determination of retention period shall be evaluated based on cost and benefit with consideration for enterprise impact.			
Schedule changes shall be syndicated to IT AND directly to identified systems for executing retention AND disposition			
Solution shall enable updates to schedules and notification of stakeholders when business objectives or laws change			
User interface shall provide transparency stakeholder organizations to the information each line of business owns - Where it is located - Length of time to inform e-discovery and data management			

	Process	Description	Risks/Consequences	RQMT #
 <b>BUSINESS</b> <b>I</b>	Realize Information Value	Gaining timely access to and ability to apply information in the course of their work, including the ability to harness information of quality as it ages and the ability to use relevant information with or without author context to maximize the enterprise value of information.	Important business decisions are made on missing information or poor quality information, resulting in poor decisions. Information is not used shortly after its creation because business has forgotten the source or location of information, or can't find it resulting in cost without corresponding value	I.1
				I.2
				I.3
 <b>PRIVACY</b> <b>J</b>	Secure Information of Value	Determining a schema for the various levels of information importance and the corresponding security needed; using an enterprise information taxonomy and network of liaisons across the business, cataloging which information each business organization generates or stores and assigning the appropriate security level; communicating these security needs to employees who generate, use, manage, and store information	Information of value is not properly secured against internal security violations or external security breaches; entities can bypass or contravene security policies, practices or procedures. Failure in securing information deeply heightens privacy issues if information accessed is not properly protected.	J.1
				J.2
				J.3
				J.4
				J.5
				J.6
 <b>PRIVACY</b> <b>K</b>	Privacy & Data Protection	Assessing privacy duties by data subject and data location, including overlapping obligations for information and information elements and a means of communicating these requirements to those employees who generate, use, access and store information	Access, transport and use limitations are not understood by employees with information custody or collections responsibility and customers or employees rights are impacted.	K.1
				K.2
				K.3
				K.4
				K.5
				K.6
				K.7
				K.8
				K.9

Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Real-time search and analytics shall be provided to apply to information and decision making - Capable even as context erodes across information sources and types - Enables realization of information value			
Availability and accessibility of information shall consider assertions of value and sources of information made in REQ #x, x - Information the business defined as valuable			
Capability to ensure cost of information to the enterprise shall be consistent and appropriate of its lifecycle - Tools to monitor and track cost			
Information in REQ#x shall be maintained in the source or system - It shall be accessible to authorized information security staff			
Some data shall be systematically classified			
Common enterprise information taxonomy shall be used with processes H & I (see related requirements)			
Single view of applicable value and regulatory requirements shall be provided based on: - Business area - Information category			
Information shall be automatically classified and secured based on its value			
Retention, privacy and security requirements shall be executed efficiently without redundancy or conflicts			
Ability to create, update and maintain an accurate catalog of privacy laws and policies by country shall be provided			
Appropriate authorization controls shall be provided to ensure the catalog is accessible to the privacy team/organization			
Policy communications shall be routine and semi-automated to identified stakeholders - Records - Business - Systems			
Critical systems shall be able to be provisioned by some of the privacy controls			
Systems shall be provisioned in a manner to protect privacy to include - Access - Masking - Controls			
Authorized information stakeholders shall have access to privacy constraints in real time. - Business - Legal - IT - Other (Custom)			
Current privacy law and protocol shall be accessible to Legal/litigation team - It shall factor law into evidence collection/analysis plan			
Privacy & data protection process shall be auditable through the system			
Data source catalog shall be used to express information assets, relevant business needs and legal obligations			

Process		Description	Risks/Consequences	RQMT #
L	Data Source Catalog & Stewardship	Establishing a common definition and object model for information and the people and system with custody of it for use in determining, defining, communicating, understanding and executing governance procedures.	The type and nature of data in a system or process is poorly understood, leading to incomplete or inaccurate application of retention, preservation, privacy and collection and disposition policy.	L.1
				L.2
				L.3
				L.4
				L.5
 M	System Provisioning	Provisioning new servers and applications, including associated storage with capabilities for systematically placing holds, enforcing retention schedules, disposing, collecting evidence and protecting data elements subject to privacy rights.	Systems are unable to comply with or execute defined procedures for retaining, preserving, collecting, protecting and disposing of information, exposing the organization to significantly higher costs and risks.	M.1
				M.2
				M.3
				M.4
				M.5
				M.6
				M.7
				M.8

Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
<p>Data source catalog shall be shared across authorized entities/stakeholders</p> <ul style="list-style-type: none"> <li>- IT</li> <li>- Records</li> <li>- Business</li> <li>- Other (Custom)</li> </ul>			
<p>Catalog shall be the primary source for controlling critical functions:</p> <ul style="list-style-type: none"> <li>- Provisioning and backup</li> <li>- Retention/disposition requirements</li> <li>- All backup, archiving and provisioning procedures</li> </ul>			
<p>Decisions for critical functions shall be transparent in the catalog for cross functional coordination, management and audit.</p>			
<p>Common definitions shall be supported to maintain consistency across ILG stakeholders describing:</p> <ul style="list-style-type: none"> <li>- Duties</li> <li>- Needs</li> <li>- Stewards</li> <li>- Employees</li> <li>- Laws</li> <li>- Lawsuits</li> </ul>			
<p>Systems shall be provisioned with protocol and technical capability to:</p> <ul style="list-style-type: none"> <li>- Retain/dispose</li> <li>- Hold/collect</li> </ul>			
<p>Provisioning function (REQ #x) shall include a properly authorized retention schedule and business value inventory.</p>			
<p>Provisioning of systems shall include capability to archive data to lower-cost tier of storage at earliest point in time.</p>			
<p>Solution shall support creation and management of well defined archive procedures.</p>			
<p>Archives shall execute retention/disposition based on approved schedules</p>			
<p>Backup shall only be used for disaster recovery of information on legal hold, according to retention schedule and business value.</p> <ul style="list-style-type: none"> <li>- It shall not be used as a long-term archive</li> </ul>			
<p>Retention schedules, legal holds and collection requests shall be systematically propagated from their respective initiators.</p>			
<p>The data source catalog shall be updated to reflect the provisioning, archiving and backup mechanisms.</p>			
<p>Data of high value actively used by the business shall be differentiated from aging data (of value to regulators only) or less frequently accessed data.</p>			


Process		Description	Risks/Consequences	RQMT #
N	Active Data Management	Differentiating high value actively used data by the business from aging data of value to regulators only or less frequently accessed data; results in increased accessibility, security, privacy; aligns and enables data value with storage tiering by value	New, valuable, aging and useless data are commingled within the data source, its backup and its non-production instances. Business users waste their time sifting through debris to find what they need without success. IT costs soar. Organization is exposed to privacy, security and legal risks.	N.1
				N.2
				N.3
				N.4
				N.5
				N.6
				N.7
				N.8
O	Disposal & Decommissioning	Disposing of data and fully decommissioning applications at the end of their business utility and after legal and regulatory duties have elapsed.	IT is unable to dispose of data and decommission systems causing significant unnecessary cost and risk; IT improperly disposes of data causing unnecessary risk and legal or business expense.	O.1
				O.2
				O.3
				O.4
				O.5
				O.6
				O.7
P	Legacy Data Management	Processes, technology and methodologies by which data is disposed and applications fully decommissioned at the end of their utility and after legal duties have elapsed	IT is unable to associate data with business stakeholders or ensure legal duties are met, leading to oversight in collecting evidence and unnecessary legal and operating costs	P.1
				P.2
				P.3
				P.4
Q	Storage Alignment	The process of determining and aligning storage capacity and allocation according to information business value and retention requirements, including optimizing utilization targets, storage reclamation and re-allocation after data is deleted to link storage cost to business need for data stored.	Storage is over-allocated, misaligned with business needs and consumes unnecessary capital; IT is unable reclaim storage and eliminate cost after data is deleted causing unnecessary cost.	Q.1
				Q.2
				Q.3
				Q.4
				Q.1
				Q.2
Q.3				





Vendor Response

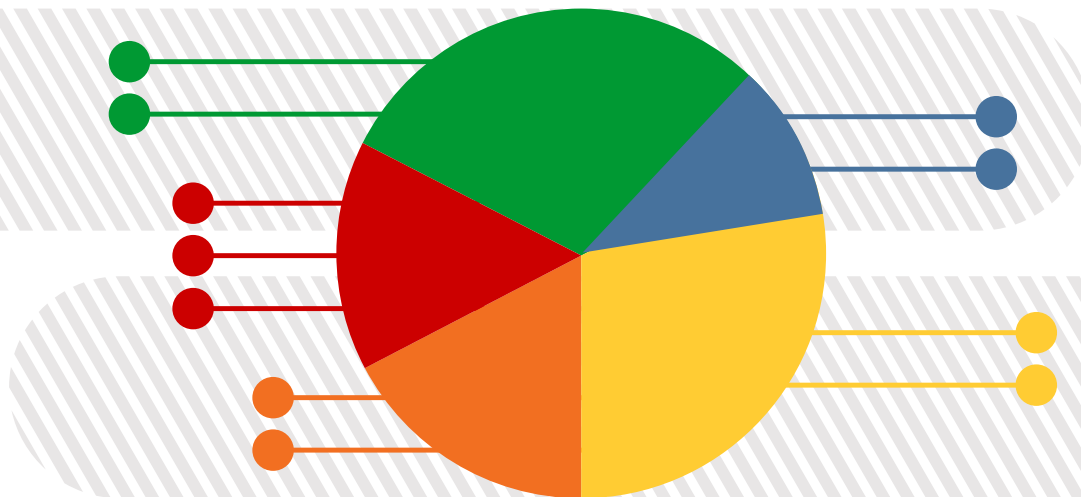
Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Business users shall have ready access to high value data			
Business users shall spend no time sifting through digital debris to locate high-value data.			
Data shall be secured and retained based on its business value			
Aging data with declining value shall be archived or migrated to lower cost storage locations over time - Based on loss/depreciating value			
Unnecessary data of no value shall be disposed of on a routine basis			
Private data shall be masked based on defined policy			
Backup data shall comply with the retention schedule			
Backup shall not be used as a long-term archive alternative			
Data shall be automatically deleted at the end of its retention period when no legal hold has been specified			
Backup data shall be routinely and systematically overwritten			
Solution shall provide interface allowing routine analysis of the data source catalog to identify systems with low business value			
Solution shall proactively determine savings opportunity of decommissioning low value systems			
Solution shall provide IT staff capability to determine duplicative systems based on its business value and taxonomy map - Useful for image consolidation			
Routine disposal shall be performed with transparent, reliable facts on preservation and retention obligations			
Authorized IT staff shall be able to look up any asset or employee to determine value AND current legal requirements			
Legal hold inventory shall maintain and express custodian and data sets subject to hold			
Legacy data on disk and tape shall be dispositioned using legal hold inventory			
Data sets subject to on-going regulatory or legal requirement shall be isolated AND “surrounding” data shall be disposed.			
Accumulation of additional legacy data shall be prohibited			
Storage shall be provisioned for new systems commensurate with retention schedules and archive protocols.			
Accounts shall be refreshed for capacity availability resulting from continuous deletion and decommissioning activity.			
Cost of storage shall be weighed in the retention schedule approval process and archive decision making. - Unit cost shall be stored and available in the data source catalog.			
Current and forecasted storage capacity needs and costs shall align to business value assigned to data AND data retention schedules.			
An optimization practice (function) shall be provided in the solution to capture benefit of deletion and decommissioning. - Allows IT to avoid continuous capacity addition.			
Solution shall provide accurate chargeback reporting by business unit AND source.			
Gap analysis between retention schedule, business value and information cost shall be included in reporting function - Informs business decision making on costs/benefits of storing data over time.			

Process		Description	Risks/Consequences	RQMT #
 <b>AUDIT</b>  <b>R</b>	Audit	Testing to assess the effectiveness of other processes, in this instance the processes for determining, communicating and executing processes and procedures for managing information based on its value and legal duties and disposing of unnecessary data.	Unable to demonstrate reasonable efforts to establish and follow governance policies and procedures increases sanctions, risks, penalties and judgments and erodes customer trust.	R.1
				R.2
				R.3
				R.4
				R.5

Vendor Response

Solution Requirements	F/P/N	Functional Description of Solution Capability	Score
Solution shall provide capability to establish and conduct testing of procedures for: <ul style="list-style-type: none"> <li>- Records management</li> <li>- Business value inventories</li> <li>- Data sources</li> <li>- Privacy requirements</li> <li>- Legal holds</li> </ul>			
Solution shall provide sample tests of organizations and record class for retention and disposition			
Solution shall provide capability to establish and conduct testing of procedures for legal matters. <ul style="list-style-type: none"> <li>- Ensures preservation duties are properly communicate and executed</li> <li>- Holds are released timely</li> </ul>			
Audit functionality shall include testing the data source catalog, backup data, and system provisioning. <ul style="list-style-type: none"> <li>- Ensures ability to comply and actual policy adherence</li> </ul>			
Audits of storage provisioning and procurement shall be compared against retention/disposition/decommissioning schedules.			

COURTESY OF



## About CGOC

CGOC (Compliance, Governance and Oversight Council) is a forum of over 2,900 legal, IT, records and information management professionals from corporations and government agencies. CGOC publishes reference guides and articles and conducts primary research; its Benchmark Reports have been cited in numerous legal opinions and briefs and its ILG Leaders Guide widely referenced and adopted by organizations. CGOC members convene in small working groups, regional meetings and its annual strategy summit to discuss information governance and economics, eDiscovery, data disposal, retention, and privacy. CGOC has been advancing governance practices and driving thought leadership since 2004. For more information go to [www.cgoc.com](http://www.cgoc.com).

