

Guidelines for Converting Company Records

Purpose

This Guideline covers the issues that need to be considered when converting company records from one medium to another (e.g. scanning hard copy to CD). Refer to the Guidelines for Storing Company Records on a Substitute Medium for determining best medium (i.e. CD, flash drive, etc).

Scope

All company records regardless of medium (i.e. hard copy, electronic) and location (i.e. PC hard drive, shared drive, off-site storage).

Conversion Review Process

Below are details and tips that need to be considered when converting records to a different medium.

Retention Time

A retention time is the length of time (days, months, years) that a record needs to be preserved. Consult the Records Retention Schedule (RRS) (retentionschedule.pg.com) to determine a record's retention time.

Retention Time Conversion Issues:

- Converting records with two years or less before disposal may not have a benefit including cost.
- Do not place records with different retention/disposal dates on a new medium (i.e. CD).
- Determining how the converted records be reviewed for disposal per company's record retention schedule.
- Records that have an Official Retention time that includes ACT (e.g. ACT+3) may need to be completed, closed, superseded before conversion. Otherwise you must create a plan on how to manage them when they are closed. Must also determine how the retention time will be applied when the record is no longer active.

Original Record

A scanned image is equal to the original in providing evidence of ... business activities and is allowed as evidence in litigation and investigations. In most cases the original can follow the proper disposal process shortly after being imaged and verified for readability. Verifying an image is based on risk with sample checks normally between 1-5 percent of the images depending on the amount.

Original Record Issues:

- Some countries require original hard copy records, check with your local Tax representative. Does not stop the conversion but records may have to be placed in storage per the company retention schedule.
- A regulation may require 100 percent image verification, check with your local Legal/QA representative. Higher verification checks increase conversion costs.
- Conversion process creates an exact copy of the original. Need to test the conversion and have periodic quality checks.
- Do not create one file from many documents. Example: Signed contracts, do not take individual contracts and scan them into one .pdf file for searching. This may be rejected as evidence as it is not an exact copy of the original. It also exposes all the contracts in the file.

Record Retrieval

Record retrieval covers how records are retrieved, by whom and how often. Typically records that are over 6 months old lose 80%+ of their retrieval and approximately 80% of records are only retrieved one/two times. Records that may be retrieved by many people need to be more accessible than retrieved by one or two if stored on a CD or any portable medium. The information that is used to retrieve a record needs to be applied for retrieval after conversion.

Retrieval Conversion Issues:

- Used by many people – the medium used may require more than one copy so others do not have to wait until someone is finished.
- Locating correct record – the record needs to be retrieved quickly and easily. Example: On a CD the records are stored in a folder tree with values as the folder name.
- OCR indexing - test accuracy using most common documents regardless of makeup and condition. Have at least 1,000 pages scanned as accuracy may be only 60-70%.

Record Makeup & Condition

A record's makeup refers to the physical aspects of the record, mostly for hard copy records. Test the worst sampling to understand what the output will be.

Makeup Conversion Issues:

- The more documents are damaged, have multiple sizes, staples or any other reason to cause extensive prep work, the higher the conversion cost.

- Faded, illegible documents will not improve in conversion.

Conversion Cost

The creation of a record has already cost the company and converting it adds to that cost. Carefully review the conversion cost against other options to make the best decision. Example: Scanning hard copy vs. off-site storage for records that will be destroyed in two years. 9,000 pages to scan at 0.03 cents per page = \$270. The 9,000 pages will fill and be charged for 6 boxes in storage at 0.30 per month, per box = \$43.20 for two years. This is more cost effective if the records are rarely used. A high retrieval rate will incur pulling and delivery costs which can make scanning the better option.

Conversion Cost Issues:

- Records with low retrieval and/or short time period before disposal may not be worth the cost to convert.
- Conversion cost may increase due to the record's preparation work and/or index detail for retrieval.

Privacy/Information Security

Converting records containing Restricted/Highly Restricted records must continue to be managed according to company policies.

Privacy/I.S. Conversion Issues:

- Conversion vendor needs to implement a process to protect our sensitive records.
- Check with Legal if retaining PII data will potential violate privacy laws.
- Records must be managed and secured as policy states regardless of medium (i.e. CD, thumb drive, microfilm).

Need Help?

For help in reviewing your conversion send an email to....

Check List

Use the following check list to help gather data to aid in decision making.

__ Retention time is known. Retention is _____

__ Decision made on what year's to/not to convert. Convert _____ Do not _____

__ Disposal review process is documented.

__ Determined hard copy record (can/cannot) be destroyed after conversion (circle one).

__ Reviewed retrieval frequency and number of people. #of people _____ # Retrieval per week _____

__ Tested OCR accuracy is acceptable.

__ Need to test worst case for acceptability (yes/no).

__ Performed cost comparison. Cost to convert _____, *Cost to store* _____

__ Record is/is not Restricted/Highly Restricted or contains PII (circle one).

Effective: