

# Information Governance Initiative



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## About the Information Governance Initiative

The [Information Governance Initiative \(IGI\)](#) is a cross-disciplinary consortium and think tank dedicated to advancing the adoption of Information Governance practices and technologies through research, publishing, advocacy and peer-to-peer networking. The IGI publishes research, benchmarking surveys, and guidance for practitioners that is freely available on its website. Join the [IGI Community](#), a place for practitioners from all facets of IG to come together and learn from each other. The IGI was founded by recognized leaders in the field of Information Governance, and is supported by leading providers of Information Governance products and services.

## About this Publication

This publication was written by the Information Governance Initiative as part of our ongoing series exploring issues, strategies, and techniques related to information governance.

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# Responding to New Regulatory Requirements

## AMERITAS LEVERAGES TECHNOLOGY FOR IMPROVED INFORMATION GOVERNANCE

### Introduction

Given the multi-disciplinary nature of Information Governance (IG), it can sometimes feel like an amorphous topic. Without an obvious starting point or way to get to grips with it, IG sometimes fails to get the high-level attention it deserves. Yet, IG is not some arbitrary notion of “best practice.”

IG is – or should be – firmly rooted in practical, results-oriented strategy and tactics. When executed intelligently, IG can make a significant contribution to the bottom line. The experience of Ameritas Life Insurance Corp., headquartered in Lincoln, Nebraska, clearly makes such a case.

The insurance company was already reviewing its information governance processes before New York Department of Financial Services introduced new regulatory standards in March 2017. The requirements of the regulation are far reaching and extend from information security and data governance, through access controls, identity management, systems and network monitoring, data privacy, environmental controls, risk assessment and incident response.

Ameritas began with a pilot project to tackle a clearly identified business problem which they addressed using data analysis, indexing, searching, tracking and reporting tools from Active Navigation. Records management and business collaboration demonstrated impressive results and feedback that could shape future activity.

Learning from the pilot project enabled Ameritas to see a clear role for the technology in key areas of records management and compliance. Having demonstrated the retention compliance goals set out for the pilot project, the company is now growing the information governance initiative. The project has expanded to ensure compliance with 23 NYCRR Part 500 through its focus on sensitive data compliance and reduced business risk.

The Ameritas approach demonstrates how organizations can begin their own IG journeys. We expect that, by demonstrating the positive contributions that IG can make in this way, IG professionals will be able to drive the topic up the organizational agenda.



# Data Remediation & Defensible Deletion Needs

Like most organizations, Ameritas experiences continued growth in digital content file shares. The storing of unstructured data represents a significant business risk, particularly given the sensitive data being held within the organization. Ameritas perceived a need to look at basic records retention.

In 2017, Ameritas initiated a pilot project to address the problem of file share sprawl. The goal of the pilot project was to understand and manage the unstructured content in file share repositories and ensure compliance with the organization's Records Retention Schedule.

The stated goals were to:

- Reduce costs and risk
- Improve management of business-critical data
- Make better information management decisions for unstructured data
- Beginning-to-end (disposal) processes.

Ameritas sought a technology partner that could help to reduce the manpower traditionally involved in file cleanup work. Rather than manually opening and reviewing the content of files held in file shares, Ameritas wanted the scope of the pilot project to determine whether this time-consuming and costly process could be effectively implemented electronically.

This pilot project demanded collaboration across the business. The collaborative effort involved Records & Information Management (RIM), Information Technology (IT), and the internal RIM network of departmental Records Coordinators and Records Representatives for the departments participating in the project.

Ameritas partnered with Active Navigation to leverage its capabilities for analysis, indexing, searching, tracking and reporting on file metadata to enable file cleanup.

This was underpinned by user coordination workshops and a defined records coordinator business process that would provide consistency across all divisions. The first workshop introduced the project and subsequent – and ongoing – workshops to serve as checkpoints between each phase of the project.

A key lesson learned from the pilot project was that support was needed to address one of the most challenging components of the remediation effort: identifying folder/file owners (and appropriate reviewers). In collaboration with IT, a Folder Owner Identification process was developed which provides interfaces with existing access control lists and permissions-based security. Records Coordinators noted this process greatly improves the accuracy of identifying appropriate reviewers compared to the manual process used in the pilot project.



# A Technology-Driven File Remediation and Defensible Deletion Process

The following excerpt highlights the approach developed by Ameritas. This structured and systematic method required a collaborative effort between Records & Information Management (RIM), Information Technology (IT), and the internal RIM network of department Records Coordinators.

## **Scope Definition:**

- Records Coordinators identify all servers/drives used by their area.

## **Scanning:**

- RIM coordinates server scanning with IT. Full server scans are processed (skim/metadata scan plus full/analysis scan).

## **Areas of Interest:**

- From the full server scans, RIM and the Records Coordinators identify owners of each high-level folder by Business/Shared Service areas to enable preparation of user export files by area of interest.

## **User Export Files:**

- For each area of interest, RIM and the Records Coordinators define specs (file aging, sensitive data, etc.) for each area's user export files.
- RIM prepares the user export files (export from Active Navigation to Excel), saves to a Business/Shared Services working folder, and notifies the Records Coordinators that the files are ready for user review.

## **User Export Files Review:**

- Records Coordinators use the Folder Owner Identification process to assign file reviewers.
- Records Coordinators split the user export file into separate files for each reviewer.
- Reviewers mark files that contain sensitive data and have met retention for disposal, unless: (1) the file is subject to a legal hold; or (2) there is a business need to retain the file.
- With appropriate permissions, the file reviewer can open the file for further review if needed via a clickable link on the user export file.
- Files identified for disposal are marked DELETE in a Markup Selection column on the user export file.

## **File Disposal:**

- Records Coordinators notify RIM when user reviews are complete.
- RIM processes the disposals.
- Active Navigation Audit Logs provide documentation of the files disposed.



New processes were created as a result of the pilot project:

- Utilized a full-server scanning strategy.
- Used Active Navigation's standard Sensitive Data fields.
- Developed a Records Coordinator business process.
- Established the Folder Owner Identification process.
- Coordination of selection criteria (minimum retention periods, etc.) with Records Coordinators for development of user export files.

These new processes allowed Ameritas to achieve significant results across multiple business areas over the course of 2017.

For example:

- 82% of files pertaining to a software implementation project were disposed, 18% were retained to meet retention requirements.
- In another department, 87% of files that met the 10-year retention were disposed. The remaining 13% have been retained to meet business needs.
- Output files from a decommissioned software system are being reviewed and disposed as part of a system decommissioning process.

## Regulatory Compliance

Following the launch of the data remediation project at Ameritas, new regulations were introduced by New York Department of Financial Services (DFS). These regulations mandate banks, insurers and other financial institutions within its regulatory jurisdiction to protect its customer information from cyber attacks. It is the first regulation of its kind in the USA.

“When the New York regulation came into play, we shifted our primary focus to sensitive data,” reports Tom Robertson, manager – electronic records. “The bonus is that we’re able to use the same tool to manage that compliance. When the direction changed, we were able to respond quickly because we already had the tool in place.”

There were also synergies between the two project goals: unstructured file share repositories presented a challenge for Ameritas to meet its regulatory responsibilities pertaining to customer data. Along with the user departments completing the retention cleanup, the sensitive data cleanup can be achieved as well.

In addition to reporting on file attributes, Active Navigation provided Ameritas with detailed textual content analysis, such as monitoring for sensitive data (PII, PHI, PCI, etc.). This analysis enabled improved information governance and storage management options and allowed Ameritas to achieve regulatory compliance and internal IT standards with the New York DFS Cybersecurity Requirements.



# 2018-2019 Remediation Plans

In 2018, Ameritas plans to further develop its use of the Active Navigation tools. The focus of this activity will primarily be on the aspects of sensitive data remediation to meet DFS regulatory needs.

- 2018: RIM focus is State of New York Regulation 500.13 (disposal of sensitive data that has met retention) and Payment Card Industry Data Security Standard (PCI DSS) compliance.
- 2018/2019: Following the Sensitive Data/Non-Public Information (NPI) retention remediation, IT Security will verify that folders with NPI have a security access review created and will verify that access on an annual basis.
- 2019 and beyond: Annual disposal of sensitive data that has met retention and automated RIM compliance with the Records Retention Schedule.

Of course, the project is ongoing. As data passes its cut-off dates, it will become the subject of renewed annual sensitive data remediation. Although the 2018 focus is very much on DFS and PCI compliance, in 2019 and beyond, the organizational focus will also return to retention and remediation. However, the flexibility of the deployed tool and the new processes stand Ameritas in good stead to respond to future regulatory and compliance requirements.

## A Collaborative Approach

The success of Ameritas' project was driven by the collaborative approach across the organization and is extending to additional technology initiatives, such as IT's data classification initiative.

Feedback from the Records Coordinators has been positive and highlights the practical advantages of using Active Navigation to deliver file reviews. For example, folders often exceed one million files. By using Active Navigation to select only files containing sensitive data (and applying aging/retention parameters), Ameritas was able to reduce the number of files to be reviewed by up to 95%, which is much appreciated by the Records Coordinators. The Records Coordinators also recognized the challenges that manual reviews would present to identify and remediate sensitive data.

This collaborative approach also extended to the technology partner. Throughout the project, from the onsite training onwards, Ameritas was supported by Active Navigation's services and support teams who provided ongoing RIM and IT support.



# Conclusion

In this case, we can see the duality of the role technology can play within an organization. The original challenge began with a technology issue: the use of unstructured file share systems leading to file sprawl and exposure to greater risk.

However, technology is now playing a major role in resolving these issues for Ameritas by removing the vast majority of time-consuming manual checks from their records management processes. As well as reducing the storage space and support required, Ameritas was able to reduce its exposure to risk and ensure compliance with the New York DFS regulations.

One major advantage was implementing improved processes and practices around sensitive data, including defensible deletion. Technology alone isn't the answer to IG, but the right technology used in the right way can be an important part of the story. Using Active Navigation will reduce costly and time-consuming manual review processes, while making it possible to extend the scope of activity. Ameritas' Records Coordinators expressed appreciation for both the technology and the processes being used to address this significant compliance issue.

Given the multi-disciplinary nature and wide-reaching scope of IG, the Ameritas approach of starting small and applying what is learned offers significant advantages. Particularly where the successes and new processes that came out of the pilot project created new possibilities and led to the rollout of the technology solution to specifically focus on additional regulatory requirements.

