

First Look

GimmelSoft Compliance Suite

Version 1.0

RIMtech Inc.

Where Software Meets Recordkeeping

www.rimtech.ca

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GimmelSoft has provided information and reviewed this report for factual accuracy.

Contents

Introduction	1
Report Scope	1
5015.2 Certification	1
GCS	2
Assessing Recordkeeping Requirements	3
Contributor Outlook Add-in	7
StoragePoint Add-in	8
GCS Features	9
File Plan Builder	9
Declaring Records with GCS	16
GCS Pricing and Delivery	18
Deletion vs Disposition	18
GCS Implementation	19
Conclusions	20
APPENDIX	1
Appendix 1 - Definitions	2
Appendix 2 – DoD 5015.2 Analysis	5

RIMtech

RIMtech is a vendor-neutral consulting services firm specializing in ECM and electronic recordkeeping technology implementation. In business since 2002, we help clients ***understand, select*** and ***implement*** Enterprise Content Management software for managing electronic records. RIMtech Principal Bruce Miller is widely regarded as the inventor of modern electronic recordkeeping software. Find out more at <http://www.rimtech.ca>.

Introduction

GimmelSoft Compliance Suite (GCS) is a new product offering for Microsoft SharePoint 2010 that delivers US DoD 5015.2 compliance to SharePoint. You can find out more about the standard at [this website](#). SharePoint has a comprehensive set of recordkeeping features, but these features are not sufficient to achieve compliance with the [5015.2 standard](#). GCS builds on top of SharePoint's existing recordkeeping capabilities and utilizes SharePoint's content management capabilities to deliver the capabilities needed to achieve certification.

Report Scope

GCS is new – as of the date of this report, it has not officially been released to market. RIMtech has been briefly introduced to the new software, but we have not yet had the opportunity for an in-depth product examination or any hands-on experience with the product. Therefore, this report is not a comprehensive feature-by-feature product analysis, but rather a brief high-level introduction only. Many organizations with SharePoint, who also practice formal recordkeeping need to know – *How do we manage our records with SharePoint?* Do we need GCS? Hence, this report will attempt to answer the following important questions:

- 1) For your recordkeeping requirements, are 5015.2 capabilities required, or will something less suffice?
- 2) What exactly do we get with GCS?
- 3) Can we manage records with just SharePoint 2010 by itself?

5015.2 Certification

Like all other 5015.2-certified products, GCS must be formally tested compliant against the standard by [JITC](#), a branch of the US Department of Defense. These tests are very rigorous, and compliance is technically very difficult and costly to achieve. Once GCS passes the tests, JITC officially certifies the product compliant, and lists it on the [registry of certified products](#). This certification remains in place as long as the vendor maintains it by submitting new product revisions to JITC for regular certification re-testing. As of the date of this report, GCS has not yet completed its initial certification testing, expected mid-September 2011.

It is important to understand that there are three “levels” of certifications granted by JITC :

Baseline	Tested to meet all requirements of Chapter 2 (minimum mandatory) and Chapter 3 (Classified Records).
Classified	Tested to meet Baseline requirements plus all requirements of Chapter 3 (Classified Records).
FOIA and PA	Tested to meet Baseline requirements, Classified requirements, plus all requirements of Chapter 4 (Freedom of Information Act and Privacy Act).

All vendors must meet baseline certification. Some are additionally certified to Classified Records, and a few have achieved all three levels of certification. As of the date of this report, GCS will be certified to Baseline requirements only.

Note that a baseline-certified product may well have some Classified and/or FOIA features, but they may not necessarily have enough to meet JITC compliance to that particular level. Many vendors achieve baseline compliance first, then work towards additional compliance levels in future releases. GimmelSoft has indicated that they intend to achieve the second two levels in future releases.

Will GCS Achieve certification? RIMtech has no doubt whatsoever. There have been delays to date, but given the technical complexity, and the fact that there are 4 products (SharePoint, GCS, Metalogix, and Colligo) in the mix, the delays to date are normal. Gimmel also has an advantage over some vendors – recordkeeping expertise. As a leading records management consultancy, Gimmel has an unusually deep bench of records management expertise.

Will SharePoint ever achieve 5015.2 certification on its own? This is an important question, as organizations need to know which application path to invest in for the foreseeable future. It is Microsoft's policy not to speculate on future releases, so any response to this question is a hypothetical opinion only. In RIMtech's opinion, a native SharePoint certification to 5015.2 baseline requirements is impossible in SharePoint 2010, highly unlikely in the next major SharePoint release (2013 or so?), but possibly in the release after that. This means we believe it is at least 6-8 years out into the future, if ever. Our rationale:

- 1) 5015.2 is highly specialized and difficult to achieve. Microsoft already experienced a certification misadventure with MOSS 2007, and learned from it.
- 2) Microsoft's focus tends to be on the general-purpose capabilities of SharePoint. Even their 2010 recordkeeping capabilities are very general-purpose in nature.
- 3) Microsoft does not have sufficiently deep expertise in recordkeeping, and it will take quite a long time to build up the required expertise. They will learn a great deal from their partnership with GimmelSoft, over time.
- 4) Before native certification could be considered, SharePoint would have to re-engineer 2010's existing core recordkeeping foundation pieces, i.e. the file plan, disposition, and case file handling. Backwards compatibility from version to version makes this rather difficult.
- 5) A strong, healthy after-market of SharePoint certification solutions would probably diminish Microsoft's need for native certification.

The way we see it at RIMtech, Microsoft would require a new release of SharePoint to fix the basics, and at least another major release to reach for certification, if they were interested in doing so. We believe that if the market responds well and buyers are generally satisfied that good solutions are available to achieve certification, Microsoft will have little incentive to reach for native certification. If the market fails to deliver however, that may change. A lot rides on the success of GimmelSoft and future competitive solutions.

GCS

GimmelSoft is a new division of the [Gimmel Group](#), a leading records management consultancy out of Houston, in business since 2002. The company formed a new division called [GimmelSoft](#) in 2010 exclusively to develop, productize, and market their new GCS product offering. Gimmel is a strategic partner with Microsoft for the delivery of large-scale records management solutions.

Think of GCS as a SharePoint plug-in, or an extension to SharePoint. It is not a separate "product" that is integrated with SharePoint. It is entirely written within SharePoint:

- SharePoint is the repository of all the records
- GCS leverages SharePoint's existing recordkeeping capabilities
- All features are written entirely in SharePoint, using its internal customization language

To meet 5015.2 requirements, GCS comes with (2) additional embedded products, each of which has an important role to play in achieving 5015.2 compliance:

[Contributor Add-in for Outlook](#)¹

From [Colligo](#). Allows Microsoft Outlook email users to declare email directly into SharePoint. Required to meet 5015 requirement 2.2.4 (*Declaring Email Messages*).

[StoragePoint](#)²

From [Metalogix](#). Allows documents to be stored outside SharePoint's internal SQL Database. [SQLServer](#) is the database underpinning SharePoint that stores all the documents and their metadata, as well as all overhead and other data³. Required to meet 5015.2 requirement 2.2.7.6.3 (*Expunge*).

If you deploy GCS, you do not necessarily have to deploy either of these two supplementary products. They are necessary to reach full 5015.2 compliance, and if you are not interested in the features they deliver, you can still use CGS without these features. Having said that, RIMtech is of the opinion that the Contributor product is important in all scenarios, as email forms the bulk of all electronic records. And the StoragePoint is extremely useful for managing overall performance.

Assessing Recordkeeping Requirements

To manage electronic records with SharePoint 2010, you have the following three options:

SharePoint OOB (Out-Of-Box)

Use the built-in recordkeeping features of SharePoint 2010. Live with any recordkeeping limitations of SharePoint.

Customize SharePoint

Extend SharePoint's OOB recordkeeping features by customizing it to compensate for the gap between what SharePoint delivers OOB, and your recordkeeping requirements.

GimmelSoft Compliance Suite

Buy GCS and add it to SharePoint. You will then have a comprehensive recordkeeping capability fully compliant with 5015.2.

For some organizations you do not have these choices – you **must** comply with US DoD 5015.2. This is the case with US Department of Defense organizations, as well as many larger US Government organizations, and even some state governments. Some corporations have also adopted compliance as a matter of policy.

Assuming you are not obliged to comply with 5015.2, which option is right for your organization? To make the right choice, you need to compare your requirements with the capabilities of all three options above. Because 5015.2 is well documented, it can serve as a benchmark against which we can assess the other two options. RIMtech has summarized the 5015.2 requirements in [Appendix 2](#). We have listed all the mandatory 5015.2 requirements for a baseline certification, which consists of all requirements in 5015.2 chapter 2 and chapter 5.

¹ More at http://www.colligo.com/products/sharepoint/contributor_add-in.asp

² More at <http://www.metalogix.com/products/StoragePoint.aspx>

³ Most databases store their metadata inside the database, and the documents outside. SQLServer stores both inside.

There are 168 baseline requirements in 5015.2. We arrived at this number by consolidating the individual numbered requirements in certain tables into a single requirement (we assume compliance with all the table requirements or none). Obviously, GCS delivers all 168, as it is fully baseline compliant.

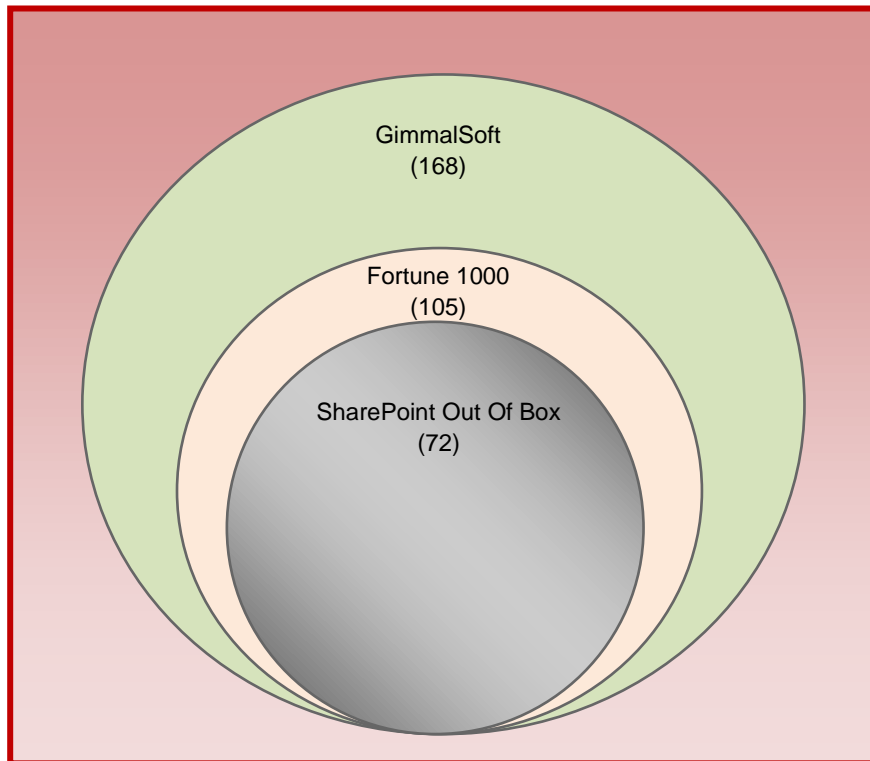
Note

See RIMtech's Report "*Managing Records in SharePoint 2010*" at www.rimtech.ca for details on SharePoint OOB capabilities and gap analysis.

The table also shows the SharePoint OOB (Out Of Box) capabilities, with 72 out of the 168 5015.2 requirements.

What if your organization does not need all 168 5015.2 requirements? Perhaps something in between the 72 SharePoint OOB and the 168 5015.2 capabilities may be adequate. To help assess this option, RIMtech has defined something we refer to as the **F1000 requirements**. This is a set of 105 out of the 168 requirements that we believe to be adequate for most organizations outside of the US government, i.e. the "Fortune 1000" companies and organizations. To arrive at this list, we eliminated from the 168 5015.2 requirements all those that were obviously unique to the US government, as well as those that we felt were needed by only a small portion of organizations (perhaps 5% or less of the market).

The relationship between the three sets of requirements is shown below. To meet F1000 requirements, we need to deliver 33 more capabilities than Microsoft delivers out of the box. And GCS delivers 63 more capabilities than the F1000 set.



Requirements Analysis

Given the SharePoint OOB capabilities, any of the following requirements would mean you have to close the gap between OOB capabilities and your requirements by customizing SharePoint. All of these capabilities define the F1000 requirements:

- 1) **Case file handling.** You need proper handling of case file types. Each category in the file plan is a Case (person, place, event, or thing), or a *Subject* (ongoing activity). SharePoint does not appropriately apply disposition to records classified against a category of type Case.
- 2) **File Plan Structure.** You need a hierarchical, enumerated and ordered file plan/retention schedule that can be managed independently of the records.
- 3) **Expunge.** You need to destroy eligible records such that they cannot possibly be reconstructed within the system.
- 4) **Container (Folder) structure.** You require the concept of a “container” to contain physical records or groups of electronic records, such as a set of records within a case file.
- 5) **Formal Disposition.** You require a formal 3-stage process to destroy records (qualify, review, dispose), and cannot tolerate SharePoint destroying records on its own without a formal review.
- 6) **Transfer.** For some records, you need to move them to another location or state, before the end of their life. Or, move them to another organization at the end of their retention period.
- 7) **Basic Cutoff.** You need to determine destruction eligibility dates based on dates other than the triggering event date, such as end of calendar year.
- 8) **Email Integration.** You need a means whereby SharePoint users can easily declare email from within Microsoft Outlook.
- 9) **Classification Accuracy Measurement.** You need a way to measure and track the classification accuracy of all declared records. RIMtech deems this to be essential.
- 10) **Records Security Model.** You need access control of declared records to act independently of the document security within SharePoint.

The following capabilities take you from the F1000 requirements to full 5015.2 compliance, as is the case with GCS:

- 1) **Supplemental Markings.** Field-level metadata control or advanced security.
- 2) **Classified Records.** You require management of security-classified records to the level of Chapter 3 in 5015.2.
- 3) **NARA Transfer.** You need to transfer electronic records to NARA (National Archives and Records Administration).
- 4) **Container Open/Close.** You need to manage the open/close state of containers to prohibit contributing additional records.
- 5) **Advanced Disposition.** Multiple triggering event dates on retention rules. Parallel lifecycle phases.
- 6) **Multi-Record Linking.** You need to record and track bi-directional links between related or unrelated records.
- 7) **Import/Export.** You need to transfer all or some of your records from one system to/from another.
- 8) **Advanced Cutoff.** You need to manage cutoff of both transfer and destructions in accordance with any arbitrary cutoff date.
- 9) **Audit Analysis.** You need to analyse audit trails to investigate possible unauthorized attempts at records access.
- 10) **Vital Records.** You need to track and record which records are vital, and manage the vital status by reviewing and cycling the status regularly.
- 11) **Backup/Rebuild.** You need to perform backups and rebuilds of specified records data, independently from overall system backup.

There is always an option to use just the OOB capabilities. This would be suitable for what RIMtech will refer to as “informal records management”, also known more generally as “Retention Management”. This option would only be suitable if all of the following were true:

- 1) Machine-Driven Destruction is acceptable. You do not require human-driven disposition.
- 2) No formal File Plan Structure. You do not have a need for a hierarchical, enumerated, structured file plan/retention schedule.
- 3) No need for Case Files. You are not concerned with applying retention rules to case files, i.e. collections of documents with the same retention rules.
- 4) You do not intend to track the accuracy of classification of declared records.
- 5) Existing SharePoint security control is adequate
- 6) You do not need a way to declare from inside Microsoft Outlook.

Retention Management means that you can use SharePoint to destroy records at the end of their assigned retention period, however the degree of recordkeeping accountability does not rise to that of “formal” recordkeeping:

- 1) You cannot be assured that the retention rules have been applied correctly. You may not have a basis to proceed with disposition
- 2) SharePoint will destroy many records without any oversight or intervention

In short, it is difficult to be truly accountable to the retention schedule without at least the F1000 capabilities.

The obvious safest route would be to simply implement GCS, which ensures you have all 168 capabilities. If you have formal recordkeeping requirements but are not a candidate for 5015.2, then you have to either purchase GCS or bridge the gap with the OOB capabilities by customizing SharePoint. As of the date of this report, there are no commercially-available add-in products that offer F1000 capabilities, hence you must customize SharePoint. How big an effort is this customization? The greater the number of requirements, and the greater the sophistication of these requirements, the greater will be the build effort. For the F1000 requirements, Rimtech predicts that the gap can be closed with a reasonable amount of customization effort, perhaps in the range from a low of 30 person-days to a high of 100 or so. This is highly variable depending on such factors as the requirements, skill level, records knowledge, etc.

Consider the customization route if:

- 1) Your IT department has the capacity to develop and maintain SharePoint customizations
- 2) You have a well-defined set of requirements that do not approach the 168 5015.2 requirements
- 3) You wish to have a highly customized solution tailored to your particular organization.
- 4) You are practicing recordkeeping in a manner unique from most standard practices

You should consider deploying GCS if:

- 1) You do not have an appetite to customize SharePoint
- 2) You have advanced recordkeeping requirements that go beyond the F1000

Here are some factors to consider on any decision as to the (3) options:

- 1) GCS delivers all the 5015.2 recordkeeping capabilities
- 2) GCS means that you have to pay for a product and its annual maintenance
- 3) With customization, you have to maintain it over time
- 4) For the cost of GCS you are getting (2) additional products, which may be useful outside of managing records

- 5) CGS will presumably be delivering Chapter 3 (Classified Records handling) capabilities in a future release

Note that GimmaSoft has announced a new product offering, due in early 2012, called **GimmaSoft Governance Suite**. This offering will drop some of the 5015.2 features, and will fall somewhere in the range between OOB and 5015.2, presumably for a lower cost. Hopefully it will be close to the F1000 feature set.

Contributor Outlook Add-in

The **Contributor Outlook Add-in** from Colligo is included with GCS. This product delivers a means whereby Outlook users can declare a record directly into SharePoint without having to exit Outlook. RIMtech believes this is extremely important, as emails constitute a large proportion (sometimes, most) of declared records.

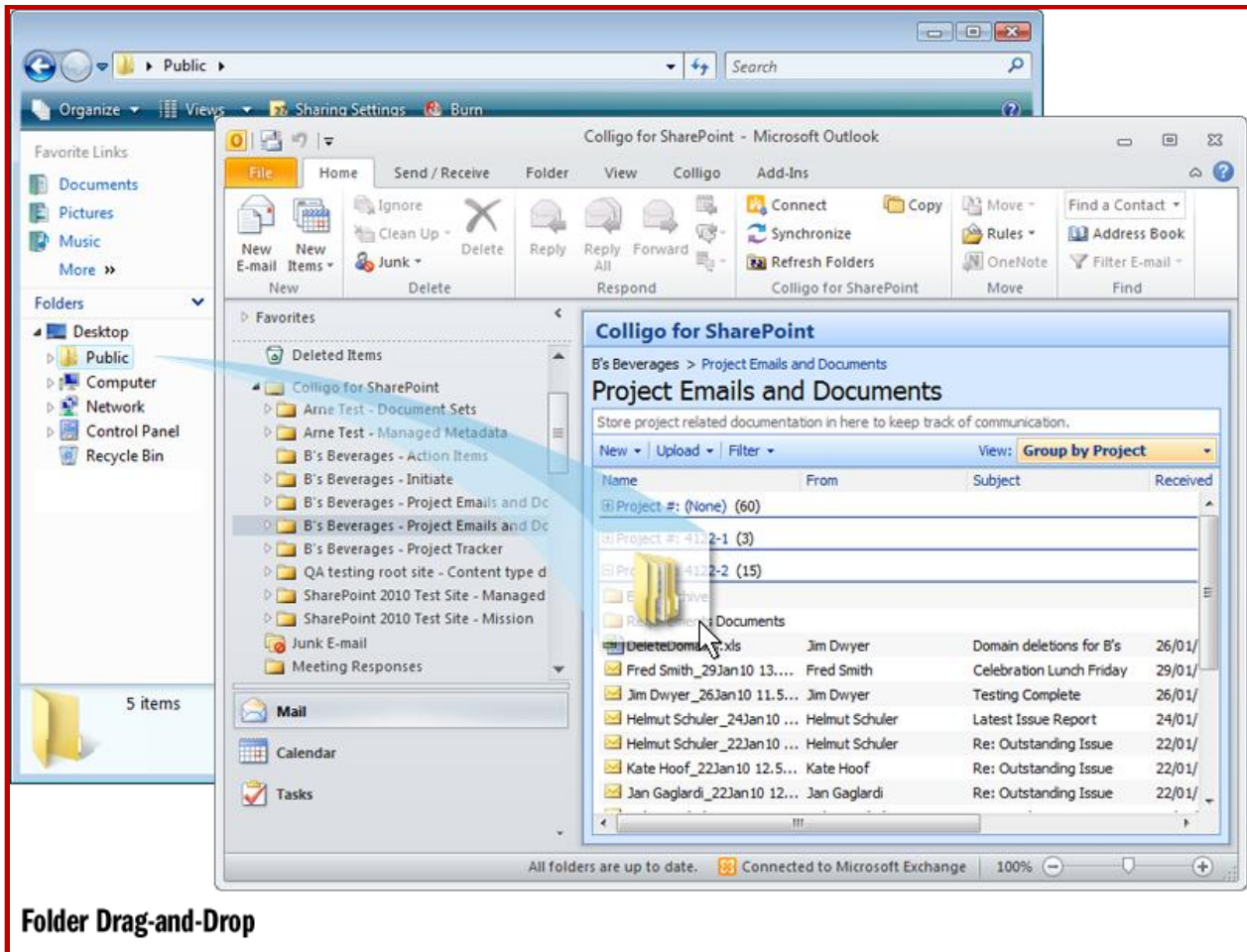
In all electronic recordkeeping solutions, there are three “stages” that every user will have to pass through every time they manually declare a document into SharePoint as a record, otherwise known by Rimtech as the “**Three Cs**”:

- 1) They will have to **Categorize** the document as a *Record*, *Work In-Progress*, or *Reference*
- 2) They will have to **Classify** the document against the file plan (if categorized as a record, or in-progress).
- 3) They will have to **Complete** a minimum of 4 metadata fields
 - a. *Content Type* (can be auto-completed in some cases)
 - b. *Subject* (What is this document about?)
 - c. *Category* (If a record or in-progress)
 - d. *Document Date*

These three things take time and effort to complete, and represent a barrier to successful adoption. With email, it is vitally important that the user can declare records as easily as possible, with a minimum of time and effort. The criticality of this cannot be overstated – a good email declaration capability is a make-it-or-break-it feature for any electronic recordkeeping solution.

This is therefore an important part of the GCS solution. With Contributor, GCS delivers the following:

- 1) Drag and Drop from Outlook mailboxes to SharePoint folders
- 2) Declare the message as a record, the attachment as a record, or any combination as a single record
- 3) Link email messages to their attachments within the system
- 4) Automatically populate email fields (To, From, Subject, etc.) to document metadata



The Contributor link is less than 100% seamless. The user must drag the email to an Outlook folder called Contributor. Then a tree display pops up for SharePoint, whereupon the user then navigates to the desired destination folder. It would be truly seamless if the destination SharePoint folders were imbedded within the Outlook folders, for a truly seamless drag and drop experience. GimmelSoft has indicated that this is expected in a future release.

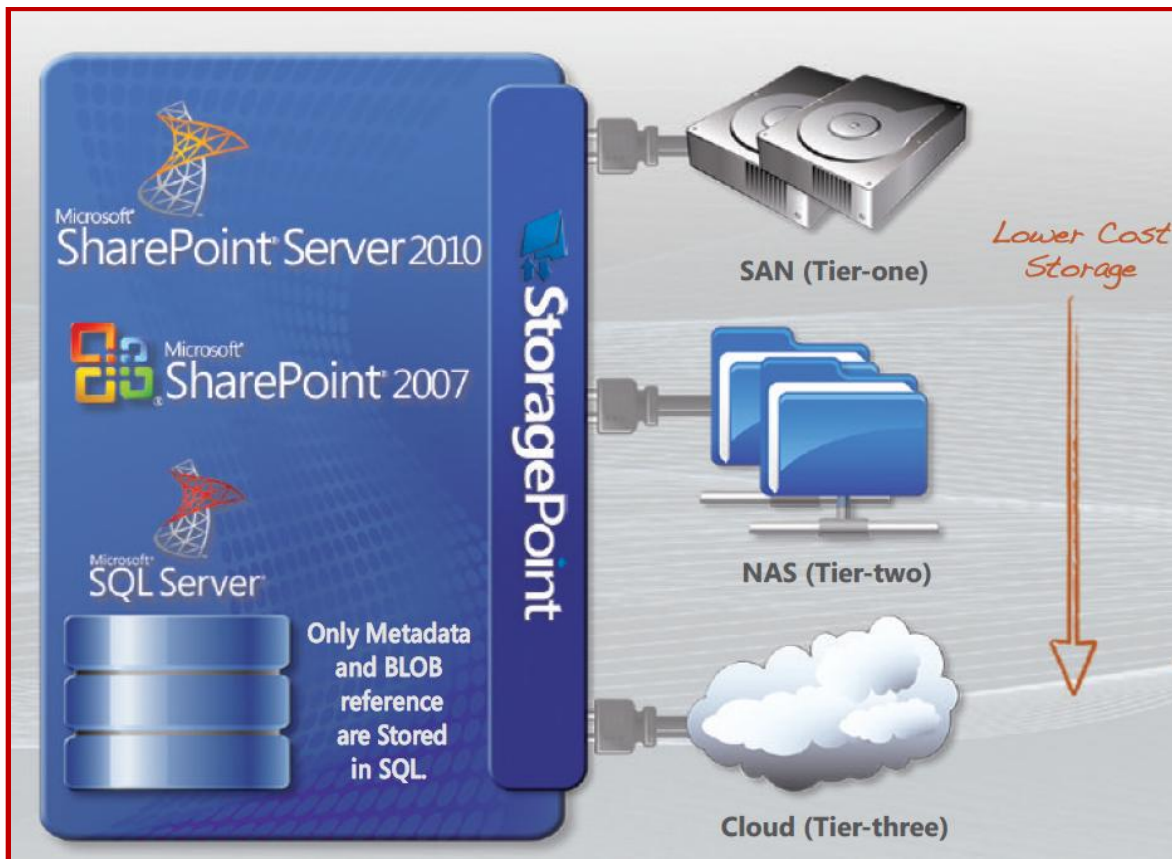
Note that the Contributor capability contained within GCS does not offer all of the features of Colligo's Contributor PRO – an upgrade license would be required to the PRO version.

StoragePoint Add-in

The 5015 standard, and RIMtech's F1000 requirements, each call for an expunge capability. This simply means that when a record is destroyed (via the disposition process), it is deleted in a non-recoverable fashion. There is no possibility of getting the document back after deletion, such as through the operating system or direct access to the database. JITC is very careful to test this rigorously, and will fail any solution that allows any retrieval of a destroyed document, no matter how difficult it may be to retrieve it.

SharePoint stores its documents (records) inside the database, along with the metadata. The documents are referred to in technical terms as BLOBs (**B**inary **L**arge **O**bjects). If a document is deleted, the space it occupies may be marked as available, but some documents and/or metadata may be retrievable before the disk space has been re-used. This leads to a latency effect whereby there is a period of uncertainty following a large deletion operation when it may be possible to recover a deleted document. This is

unacceptable, and GCS uses StoragePoint to overcome this problem. StoragePoint stores the records outside the database on a separate logical and physical storage device, transparently to SharePoint. When Disposition is carried out, the records are then truly expunged.



Only documents stored outside SharePoint can be expunged. At the time you install GCS, you have to specify that all declared records are to be stored on external media. This is optional – you can elect to keep some or all of the records inside SharePoint, however they will not be expunged at disposition time, just deleted.

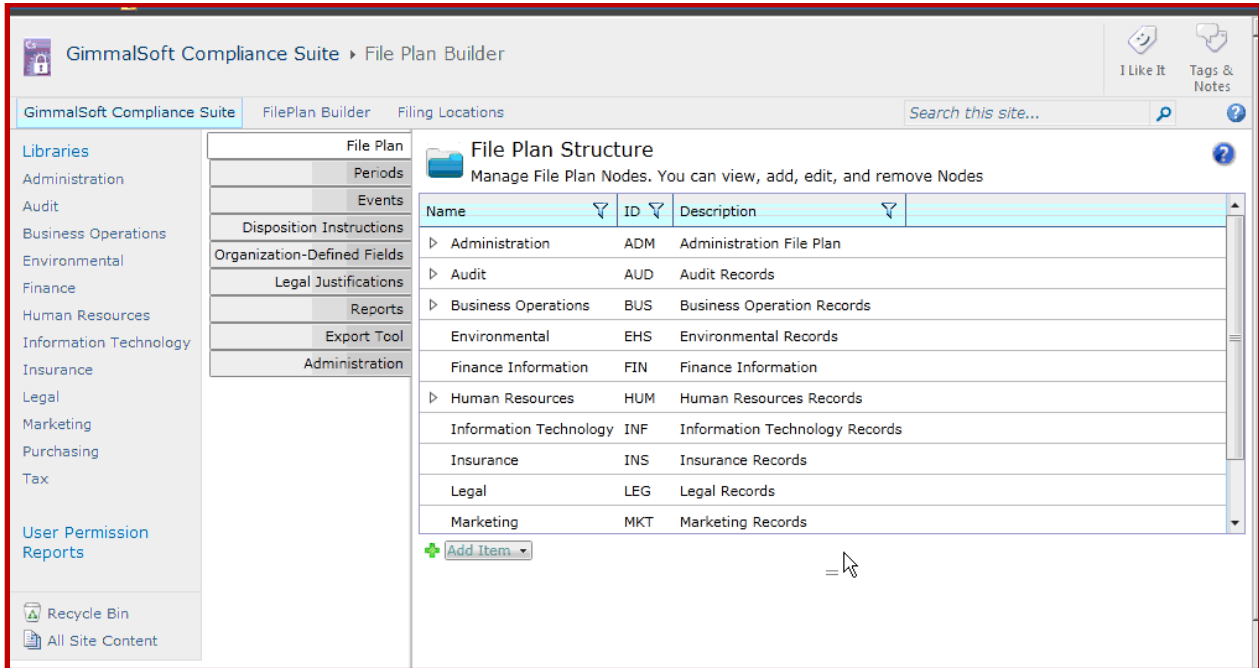
There is a secondary benefit to StoragePoint – you can optimize data storage by allocating data on different servers and media to avoid internal data storage limitations within SharePoint. This allows you to maintain maximum performance on large systems.

GCS Features

RIMtech has only enjoyed a cursory examination of GCS, hence we are unable to give a comprehensive feature-by-feature explanation and review. We will therefore show some of the key features that illustrate the basic product functionality.

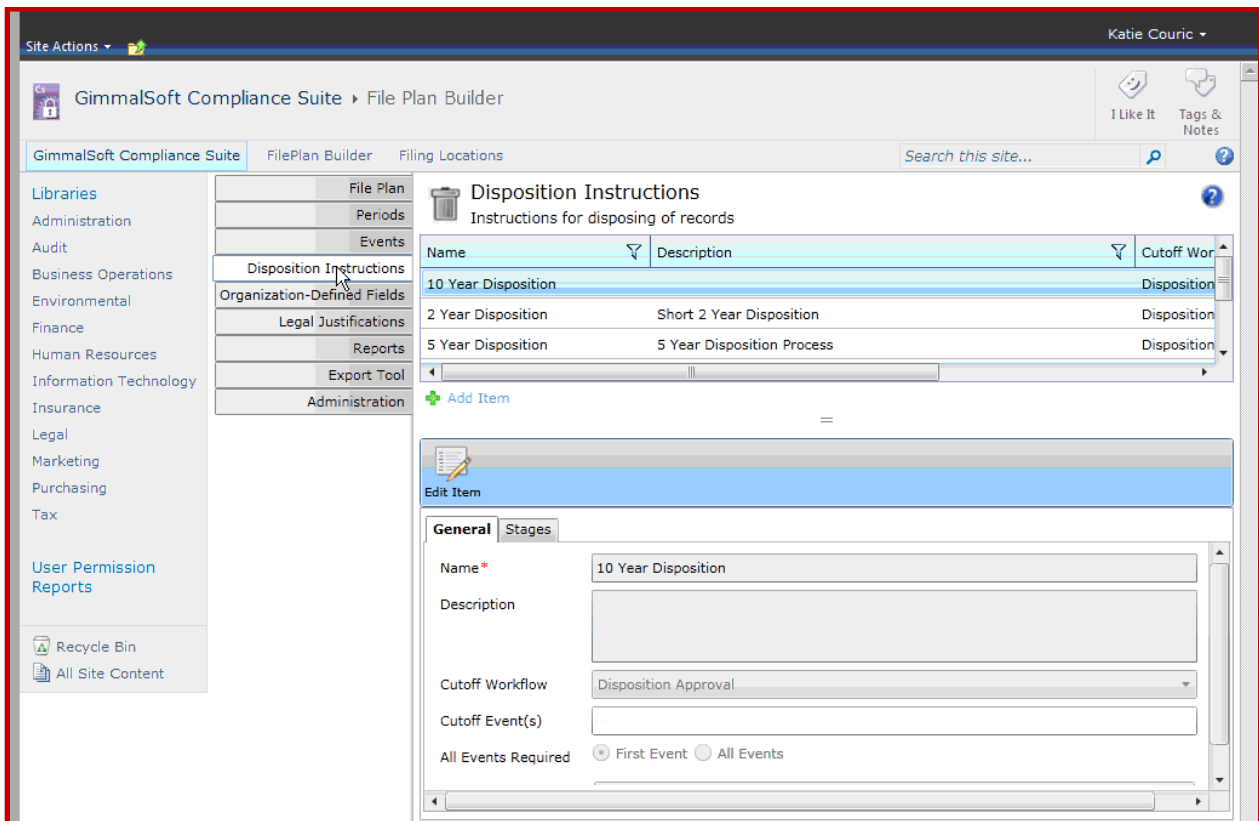
File Plan Builder

This module allows you to build and maintain the hierarchical file plan. Each node in the file plan takes the form of a folder inside SharePoint. GCS manages the associations between file plan node, and the assigned retention instruction(s) for that category. You are presented with a look and feel typical of any modern 5015.2-compliant file plan builder. You create a new category by specifying an ID and Subject, and any other fields you need to describe your categories.



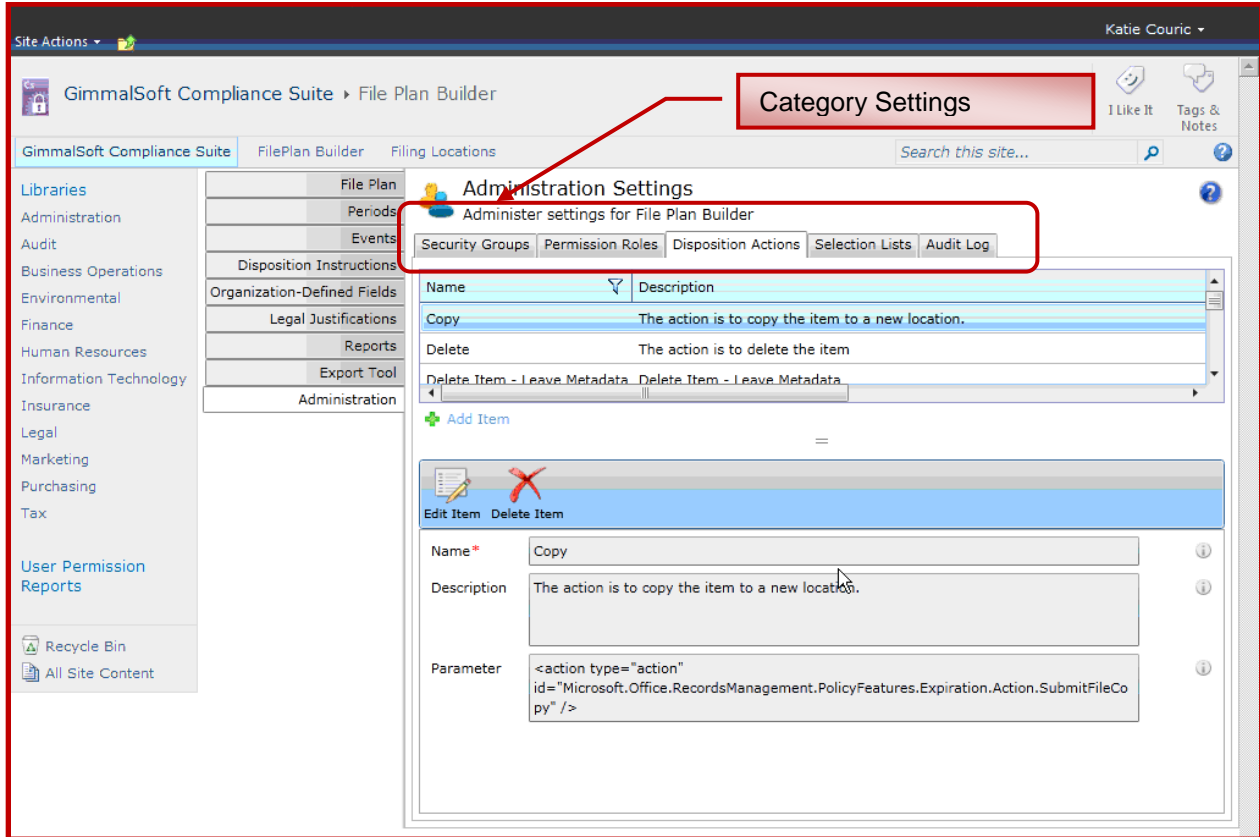
As seen in the screen above you can add, edit and delete categories (nodes) from the file plan in this site. All the references and inheritance is automatically taken care of when you build the file plan. For example, the assigned retention rule on a Primary category will inherit downward automatically to the secondary and tertiary child categories, unless you over-ride it.

The screen that follows shows how you enter a disposition instruction and assign it to a category:

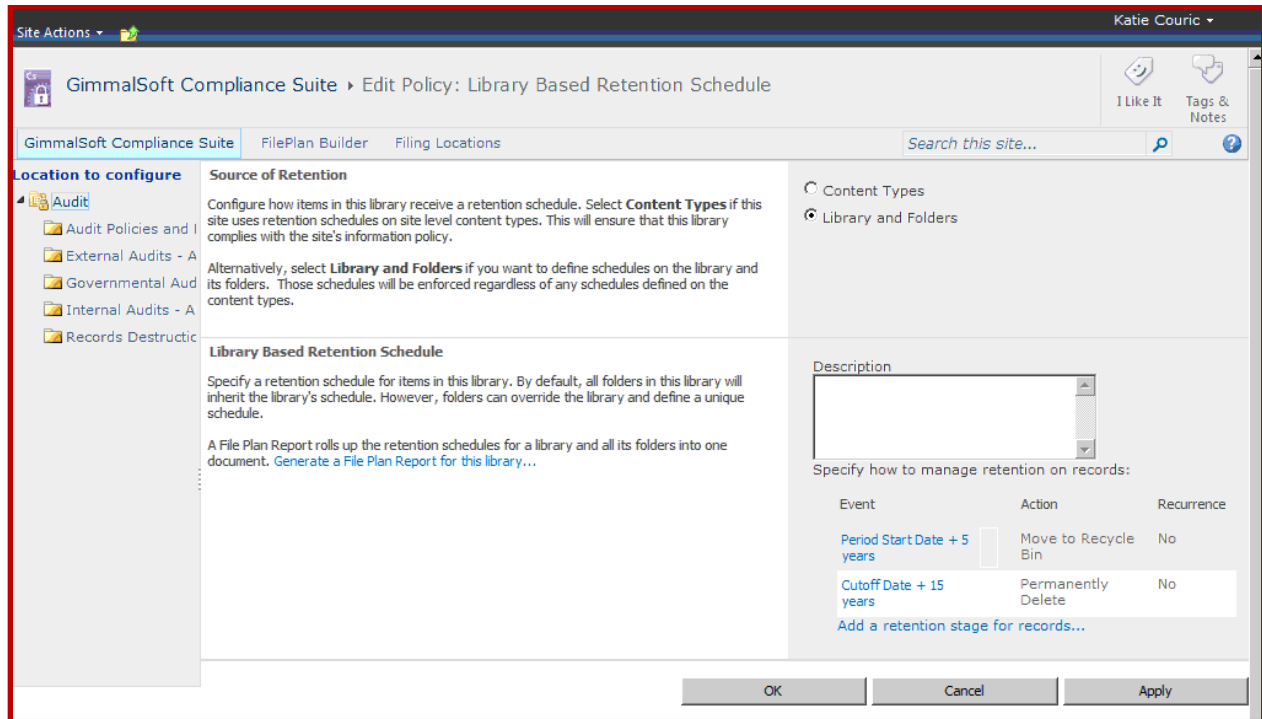


Notice the 5015 **Cutoff** field (Cutoffs are implemented via internal SharePoint workflows), as well as the All Events Required. This is a (rather esoteric) 5015.2 requirement that allows for multiple events that have to be satisfied to qualify the record(s) for disposition.

The following screen shows the (5) tabs of Administrator Settings that can be applied to any category in the file plan:

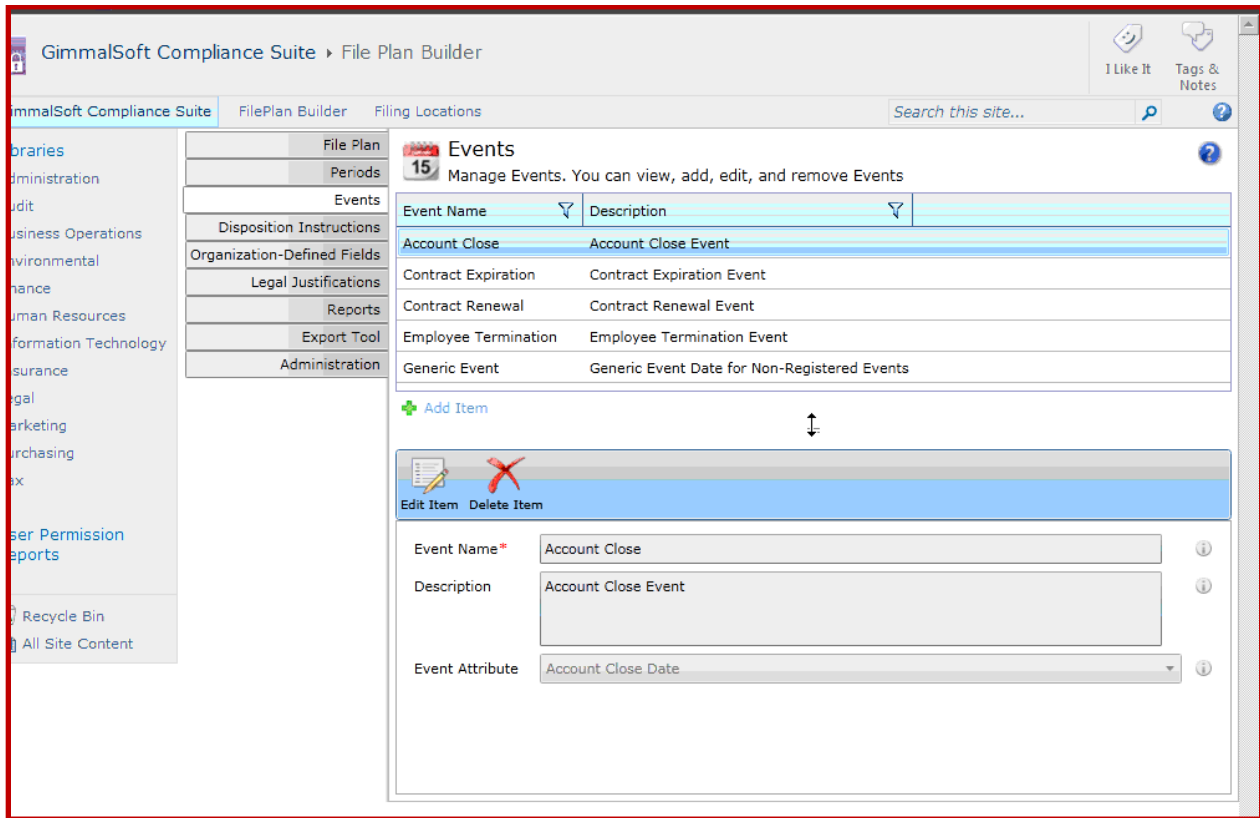


In the screen below you can see that GimmalSoft has replaced the SharePoint OOB Policy Edit screen with their own. On the left is the file plan navigation tree, showing the currently selected category (Audit). On the upper right notice that this particular policy (retention rule) can be applied to either a Content Type or a Library/Folder. A convenient **File Plan Report** is available on this screen as well. Note also that the Cutoff dates are being included in the retention rules, per 5015.2 requirements.

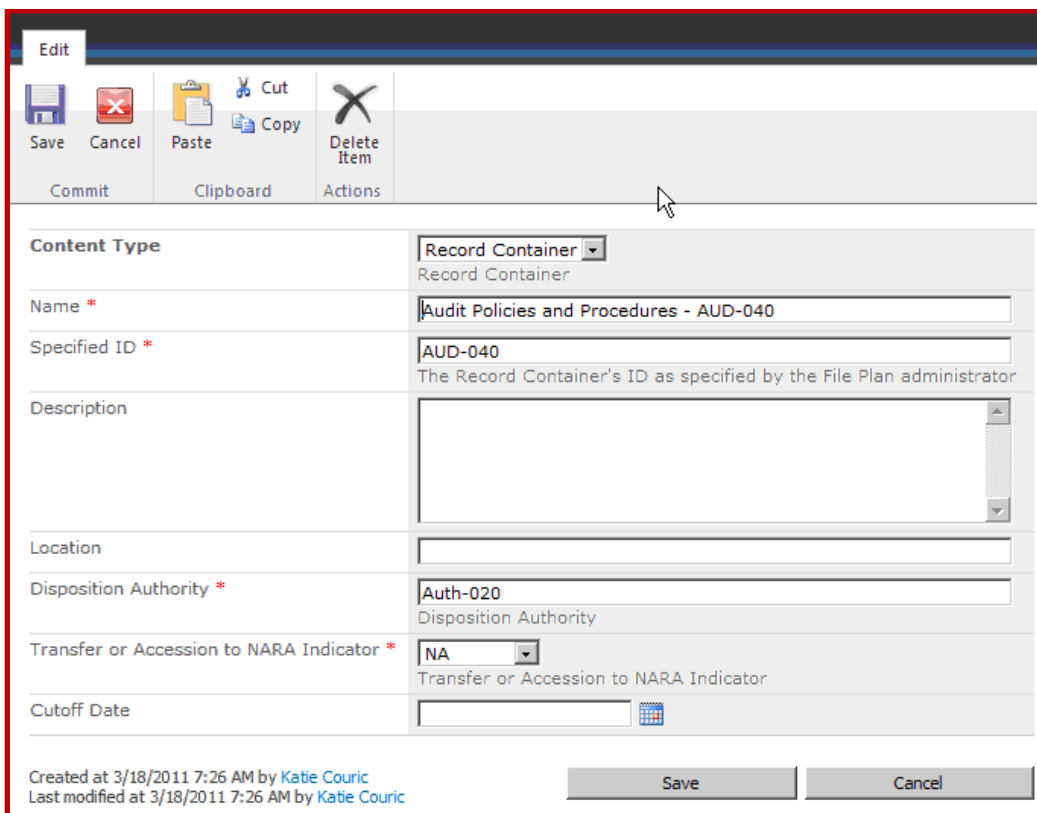


The screen below shows an extremely important concept – Event Management. In order to properly manage case files, all event dates (contract end date for XYX Security Services Contract, Employment Termination for employee Smith, etc.) have to be stored and managed in a single location, and linked to the requisite file plan categories. In SharePoint OOB, event dates are associated with individual records, which is not applicable to case files. See RIMtech’s report “*Managing Records With SharePoint 2010⁴⁴*” for a comprehensive treatment of this important topic.

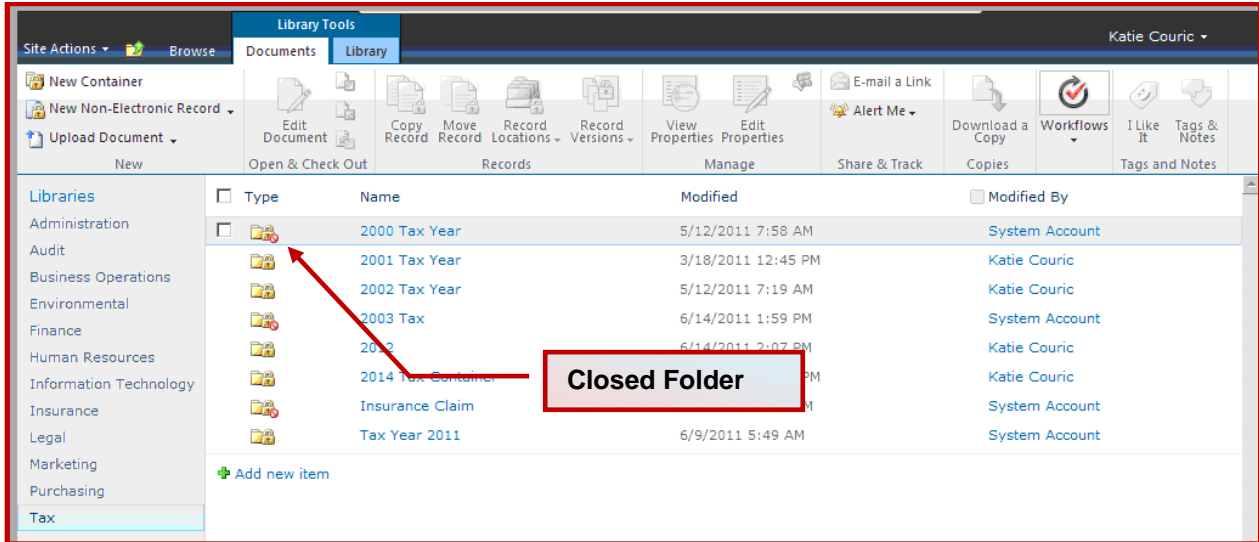
⁴⁴ Available at <http://www.rimtech.ca>



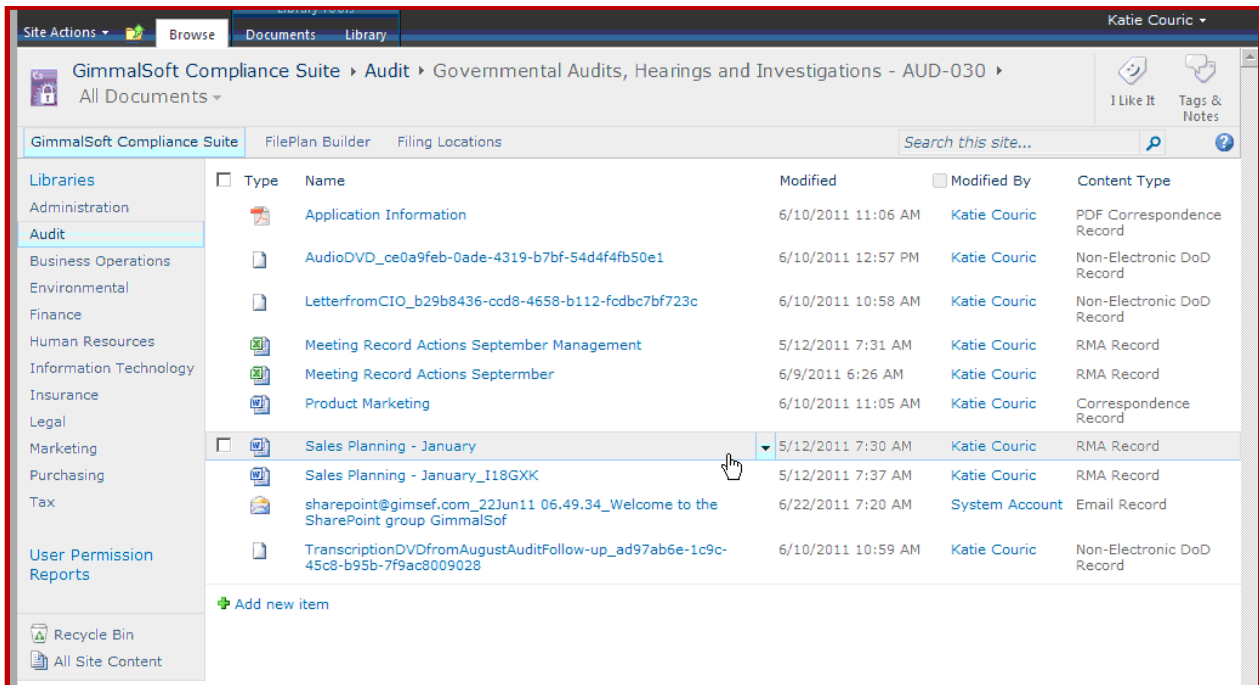
A SharePoint folder can be a record or a container (of a record). You have to explicitly create a content type called a **Container**, as shown below:



A container or folder may be **Closed**, per the 5015.2 definition of Closed (no more declarations into that folder/container). GCS then displays a small “no-go” symbol on the folder or container as shown below:



The padlock symbol on the document is SharePoint’s way of showing the document is a declared record. The screen below shows a view of declared records classified into category AUD-030, (Government Audits, Hearings and Investigations):



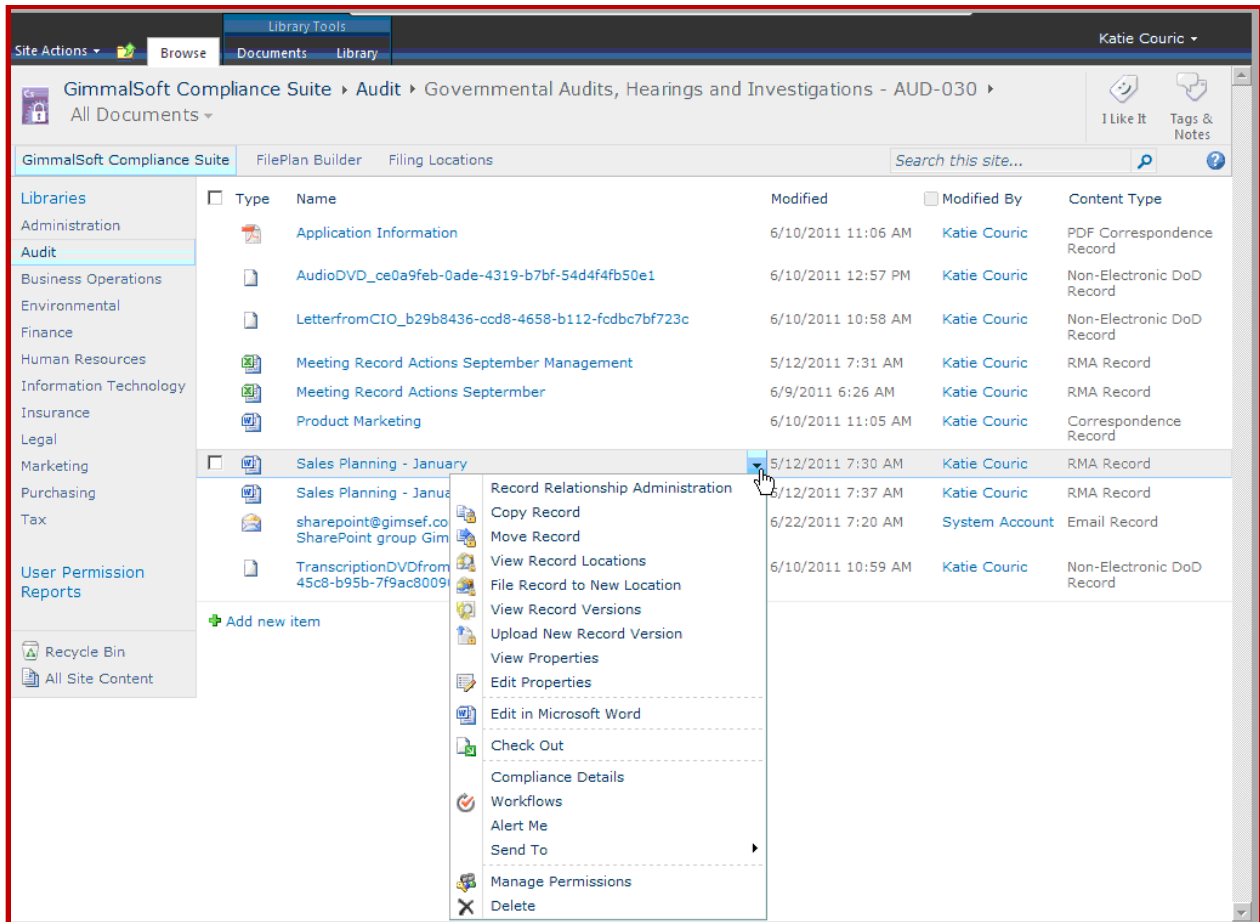
The user browsed the file plan to that particular AUD-030 category. Note the following:

- 1) There is a good mix of document types – PDF, Excel, MS Word, and an Email message (presumably captured through *Contributor*).

- 2) There are three *Non-Electronic* documents (see Content Type column). This is an important concept in 5015.2. An N-Doc (RIMtech abbreviation) is a record with no stored electronic body, i.e. a map, core sample, painting, photograph, or similar artefact.

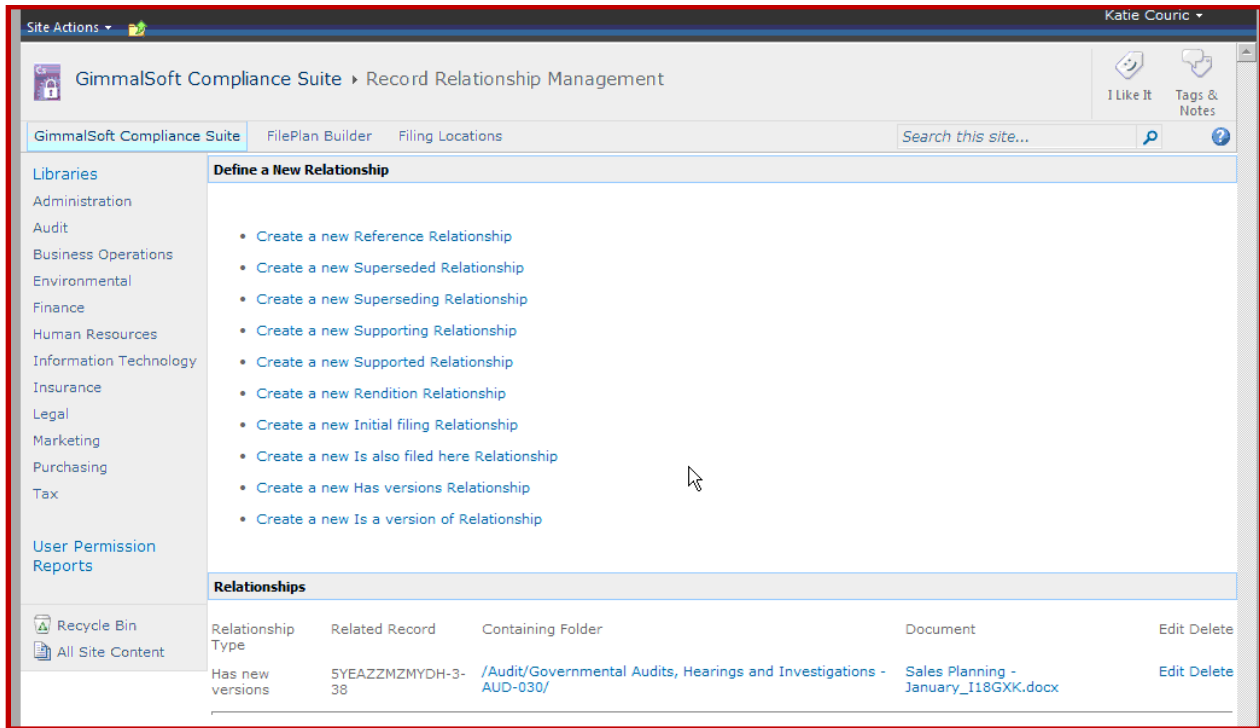
If either of these records was on hold, presumably we would see the SharePoint padlock icon on them.

This next screen shows the right-click context menu that appears on a selected record:



Most of these menu options are unique to GCS, and not available on the SharePoint OOB, such as Re-Classify (File Record to New Location), and Upload New Record Version.

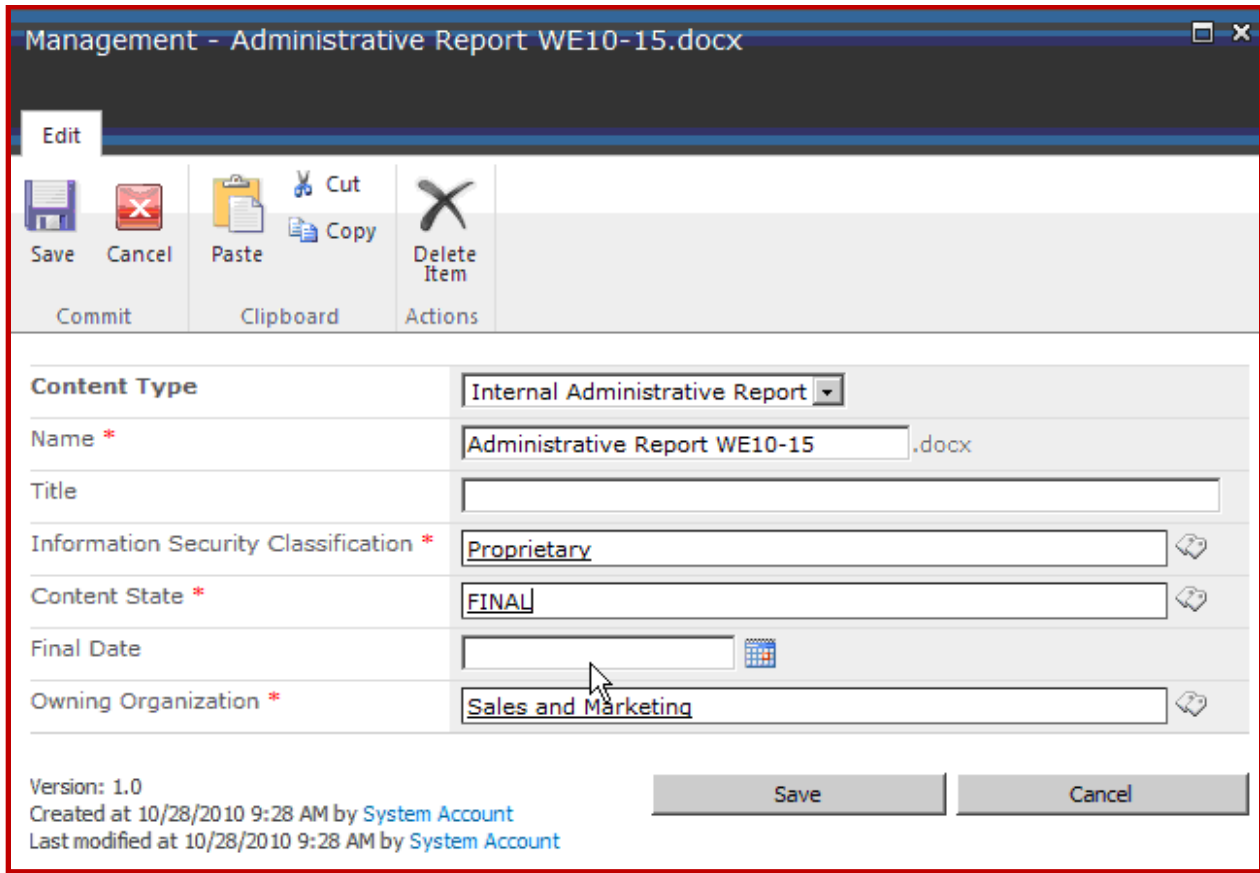
Relationships between records and their container, and between other records, is an important part of 5015.2. Requirement 2.2.3.21 for examples allows you to declare a Word document as a record, and the PDF of that document as a rendition of the record. The following screen shows the kinds of relationships you can define:



Relationships can be bi-directional, peer-to-peer, or parent-child. This is a fairly sophisticated capability that would likely not be used in any but the most advanced circumstances, as it can add a layer of complexity to the recordkeeping if not used judiciously.

Declaring Records with GCS

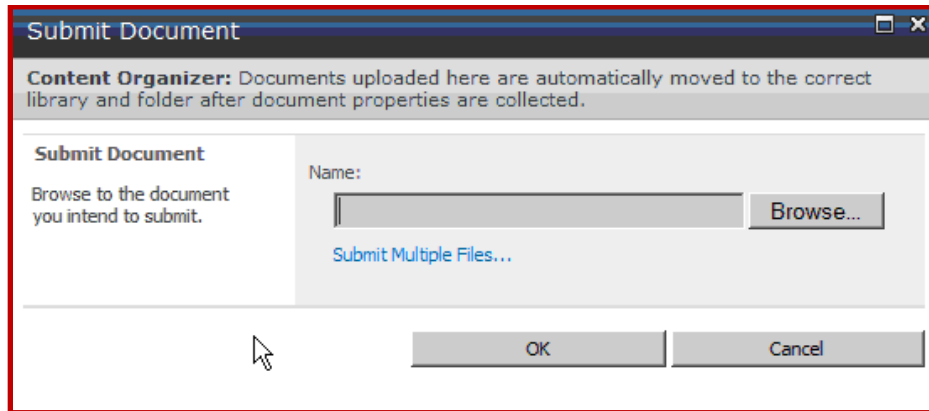
RIMtech has not had an opportunity to examine the important Email Drag/Drop method of declaring records, which would utilize the Contributor product. The screen below however shows a basic manual declaration of a single document:



There are a few fields of interest here that are driven by 5015.2:

- Information Security Classification** This is the usage of 5015.2 security features for all records. This is a multi-level drop-down that sets a document-level security that has no relation with the document's original (pre-declaration) SharePoint security settings – the two are completely independent. This security classification is compared against the user's security ROLE, among other things, to determine who can see that records.
- Content State** Either WIP (Work in Progress), Temporary, or FINAL. While not a 5015.2 requirement, this is a generally accepted best practice in all modern electronic recordkeeping solutions.
- Owning Organization** This is 5015.2 language referring to OPR (Office of Primary Responsibility).

The following screen shows that you can select multiple documents in a single declaration, one of the more advanced 5015.2 requirements:



GCS Pricing and Delivery

It is difficult to clearly articulate specific pricing for GCS. To simplify pricing, GimmelSoft has linked their price to the purchase of SharePoint. In other words, the price of GCS is a so-called “uplift” of whatever you paid for SharePoint itself. SharePoint pricing is rather complex to determine, as it depends on which pieces you purchase, whether you are using a server or CALs (**C**lient **A**ccess **L**icenses) licensing model (or both), and whether you have external users (clients, vendors, partners) that are using applications that in turn use SharePoint. All these factors are taken into account to determine your total SharePoint cost.

GCS is priced based on the CAL licensing model. Based on the SharePoint cost, GCS will assess a percentage uplift of that cost. There are two components of GCS pricing:

Software Cost	One-time purchase price for life.
Annual Support	1 year of support, including all upgrades and patches, and access to telephone support and help desk. Approximately 28% of software purchase cost, per year.

GCS cost should typically come in somewhere around 30% of the SharePoint cost (based on CAL licensing model). The per-CAL cost declines fairly steeply with increasing volume. GimmelSoft says they intend for each CAL license to be “well under \$100, with a steep volume discount”. If we assume 1,000 users, and a SharePoint cost of \$100,000, GCS should cost approximately \$30,000 (1-time), with \$28,000 annual support fees. The higher the number of SharePoint users (CALs), the lower will be the per-CAL price.

Remember that the GCS price includes the *Contributor for Outlook and StoragePoint* products, which greatly increases value per license.

Deletion vs Disposition

In order to apply sound recordkeeping practices to SharePoint, we must understand the difference between [Deletion](#) and [Disposition](#).

Deletion refers to a simple, arbitrary deletion of a document. It can be completely user-initiated, and manually executed. For example, you simply select a document in SharePoint and delete it⁵. Or it can be machine-initiated and machine executed, perhaps by a pre-determined workflow process.

⁵ Assuming you have deletion privileges

Disposition however is very different from deletion. Disposition refers to a formal, structured process whereby documents are evaluated against formal rules (retention rules) within an approved list of rules (retention schedule) to determine which documents are qualified to be *destroyed* or *transferred* to a permanent archive, in accordance with the applicable retention rule. Disposition is a human-initiated process that consists of the following three typical steps or phases:

- | | |
|---------------------|--|
| 1 Qualify | Documents are measured against applicable retention rules to determine if they are qualified for destruction or transfer. |
| 2 Review | A qualified Records Administrator reviews the qualified documents to validate their status, changing the status if required. |
| 3 Processing | Qualified documents are destroyed or transferred, at the request of the Records Administrator. |

The distinction between deletion and disposition is extremely important to understand, because both need to be happening in SharePoint *at the same time*. Think of deletion as **informal** destruction, in the sense that the decision as to *what* to delete and *when* can be made arbitrarily, by anyone at any time, for any reason. Think of disposition as **formal** destruction, in that the decision as to what to delete, when, and why, is not arbitrary – it is dictated by an authoritative centralized rule list known as a retention schedule. This retention schedule is formally pre-approved and is based upon laws and policy that govern the organization. Out of the box, SharePoint implements **deletion**, not **disposition**. With SharePoint's OOB retention policies it may seem as if we are doing recordkeeping, but we are not – we are doing **Deletion**.

GCS Implementation

Most all EDRMS (Electronic Document and Records Management System) projects in the past 15 years have failed to deliver on the recordkeeping element. Most projects start out with the goal of delivering recordkeeping accountability, but invariably end up abandoning recordkeeping. Fortunately the reasons for these failures are now very clear, as are the actions necessary to avoid these failures:

- 1) **Reason for Failure** → Insufficient emphasis on increasing the organization's overall value of recordkeeping in the eyes of everyday users. **Solution** → There needs to be major emphasis on changing perceptions, culture, policies, and attitude toward recordkeeping.
- 2) **Reason for Failure** → EDRM software buyers do not sufficiently understand the recordkeeping capabilities of the software, or how to use them to achieve widespread user adoption. **Solution** → Key project managers and records managers need to master these specific features and adapt it to their organization's specific requirements.
- 3) **Reason for Failure** → There has been no means of quantifying or measuring the success or failure of the projects. **Solution** → The organization has to adopt a quantitative means of measuring the success of the project on a daily, weekly, and monthly basis.

RIMtech takes the position that the implementation of any 5015.2-compliant product will fail unless significant project resources are spent on implementation planning in accordance with a proven methodology that overcomes the 3 points of failure above. GCS will inevitably be no different than any other 5015.2-certified product. Implementation will determine project success, not product.

There are certain inviolable principals that are essential to successful electronic recordkeeping success. They are:

- Qualification** How users decide which documents to manage as business records.
- Declaration** Users have to decide that a particular document is a business record. Which ones? Similarly, when creating a document, at which point will they turn it over to the organization as a business record?
- Classification** Each record must be assigned an appropriate retention rule from the approved list of rules, or retention schedule.

If users consistently **qualify** appropriately, **declare** the documents as records, and properly **classify** them, we can proceed with **Disposition**, where we will destroy records in accordance with the official approved retention schedule. Disposition is the “end game”, where everything comes together in a way that allows us to accurately destroy massive quantities of recorded business records with full legal confidence. If declared records are not classified correctly, too many would be destroyed too early or too late, which could prevent any disposition from taking place at all.

BEST PRACTICE

Measure **Classification Accuracy**, by department, each day. Measure **Qualification Rate** and **Declaration Rate** at least once per month. Take immediate action if either number falls out of range.

Each of these three factors (*qualify, declare, classification*) is in fact a **critical project measurement metric**⁶. **Everything** in any electronic recordkeeping endeavour contributes in some way, however indirectly, to one of these three factors. Each factor can, and must, be measured against an acceptable threshold. Any organization can readily agree upon a minimum acceptable threshold for each of these three factors. Some typical acceptability thresholds might be:

- | | |
|--------------------------------|--|
| Qualification | 5% of all incoming email, 95% of all documents created and downloaded. |
| Declaration | 95% of all business records should be declared into SharePoint. |
| Classification Accuracy | A minimum 85% of all declared records must be properly classified |

Each of these three factors is easily measured, and **must** be regularly measured, by department, on a regular basis. Further, we need to “hit” all three to succeed. We cannot fail on any of the three, or the entire project will fail. Put another way, if we cannot run Disposition with complete confidence, which is based on the accuracy of the classification, the project simply is not successful.

Conclusions

RIMTech believes that GCS is a potential game-changer in the SharePoint market. Early indications are that GCS has done a good job of delivering the necessary features for 5015.2 compliance. Gimmel appears at this point to have invested appropriately to the level needed to ensure a successful product. Like any new software product, it will take time for the product, its documentation, and its support to improve.

There are many questions remaining, but we have to wait until the product is out in the real world to get more answers. We look forward to learning more about GCS and its companion products scheduled for 2012. It will be interesting to see what portion of the market opts to go with GCS, and what portion opts to customize. At this early point, GCS looks like it should be a safe bet for 5015.2 compliance for SharePoint 2010. RIMtech will continue to follow this product, as well as SharePoint 2010 itself.

⁶ See details in RIMtech’s forthcoming book “*Managing Electronic Records*”

APPENDIX

Appendix 1 - Definitions

- Case Files** A category containing documents whereby the business activity has a defined end date. Typically a *Person, Place, Event, or Thing*. Disposition is triggered by a date, such as “*End of Useful Life*” (A machine), or “*Close of all Legal Matters*” (A workplace Accident). Example – employment files, typically qualified for disposition 3 years after termination of employment. All records within a case file reach disposition and are processed as a complete, intact group – they are never separated or processed as individual records. Many organizations have 50% or more of all business records as case files.
- Classify** The process whereby a user assigns a formal retention rule to a document, as part of the Declaration process. Typically achieved indirectly, by virtue of selecting a storage location (typically a folder) that matches the subject of the document, and which bears the appropriate retention rule for that subject.
- Declare** Make a document a record. Once declared, a document is generally tracked by software, and prevented from deletion (locked), except via a formal disposition process.
- Deletion** As distinguished from **Disposition**. An arbitrary deletion by a SharePoint user/administrator, or process. Deletion of a document by any method other than Disposition. Some examples of deletion:
- 1) Retention schedule has expired and SharePoint automatically deletes the document in accordance with its retention policy.
 - 2) End user with deletion privileges deletes the document
 - 3) A SharePoint administrator deletes a document
- Disposition** As distinguished from **Deletion**. Formal, structured process of determining what happens to records at the end of their retention period. The process is human-initiated, and the decision as to what is destroyed/transferred is ultimately decided by a human (the Records Administrator). Disposition yields (3) possible outcomes:
- 1) **Destroy** (typically 95-99%)
 - 2) **Transfer** to Archive (typically 1-5%) for permanent archival storage
 - 3) **Unknown**. Retain until disposition is known. Some Possibilities:
 - Held for legal review
 - In Dispute
 - Disposition simply not yet know or decided
- Document** A single piece of recorded information stored in SharePoint. A document may be in one of the following “states”:
- Being managed as a record (has been declared)
 - Meets the criteria of a record but is not being managed as a record (not declared)
 - Not a record. Does not meet the qualification of a business record, according to the organization’s definition of a record.
- DoD 5015.2** A US Government standard specifying minimum capability of software for the purpose of managing electronic records. Can be found at <http://jitc.fhu.disa.mil/recmgt/standards.html>.

Event Date	The date that triggers the Disposition of a set of record(s) in a case file. Suppose for example a retention rule for Contracts of “ <i>Destroy 2 years following contract end</i> ”. The trigger date for records about contracts is therefore the contract end date. If the contract for Safe-Tee Security for instance ends Jan 15 2009, the records are qualified for disposition on Jan 15 2011.
Expunge	Means of deleting (destroying) records from the system such that they cannot be recovered by any manner. Contrasted with Deletion, in which there is no guarantee that the deleted record may be recoverable in some manner.
F1000	RIMtech term referring to the subset of DoD 5015.2 capabilities required to satisfy the recordkeeping needs of Fortune 1000 firms.
OPR	Office of Primary Responsibility. The “home” location of the (electronic or paper) records of a specific category. These records are considered the “master” records, as distinguished from secondary (transient) records classified to this specified category. Constituent records contributing to this category may well be stored outside the OPR’s location. Typically the OPR represents the business unit with the most operational need for these records, and the hence the most authoritative position regarding their storage, use, and disposition. It is a common practice to apply the official applicable retention rule to OPR records and a different, more temporary retention rule to records of the same category stored outside the OPR (such as 2 years then destroy).
Record	<p>A document that meets the criteria of a record. A document that is being managed as a record. Smallest atomic unit that can reach disposition. Characteristics of a record:</p> <ol style="list-style-type: none"> 1) It is assigned a retention rule from the official retention schedule 2) It cannot be deleted, except by the formal records disposition process (“locked down”). <p>Possible forms of a record:</p> <ol style="list-style-type: none"> 1) <i>Electronic Document.</i> Any electronic format (.DOCX, .PDF, TIFF, etc.) 2) <i>Non-Electronic Document.</i> Metadata of a physical document may be recorded and tracked, but the physical document is not available in electronic form. Single document, electronically profiled, tracked, recorded, but content not stored or readable. Could be paper, photograph, or a non-paper artefact (microfilm, map, core sample, etc.) 3) <i>Box.</i> Multiple documents, stored in a container (box), tracked to box level only.
Retention Schedule	Also known as a File Plan . The list of approved retention periods and disposition rules for each business activity or subject within the organization. Driven by legislative obligation (various laws and regulations that apply to the business), and operational corporate policies.
Schedule	Two meanings: <ol style="list-style-type: none"> 1) Noun. The “schedule”. The retention schedule (list of categories and their retention rules) 2) Verb. To “schedule”. The act of applying the retention rules to qualified records.
Real-Time Disposition	Process of SharePoint whereby documents with an assigned retention schedule, where the conditions for end-of life have been met, are automatically destroyed without any human intervention.

RM

Records Manager/Administrator.

Subject Files

A category containing documents whereby the business activity is ongoing without any defined activity end date, e.g. "Travel". Documents are qualified for disposition once they reach a certain age, i.e. after 2 years. Individual documents reach disposition and are processed independently of the other documents of the same subject. Individual documents can reach the age of disposition, while those not yet aged to disposition are left behind.

Transfer

Move record to a physically separate storage location for permanent storage. Remove from e-records repository. Also known as "accessioning". Not needed for most F-1000 recordkeeping

Appendix 2 – DoD 5015.2 Analysis

The table that follows shows the following comparative analysis of DoD 5015.2 requirements:

Requirement	Enumerated requirement from 5015.2 Standard
Description	Brief description of the requirement, from the 5015.2 standard
F1000 Requirements	Rimtech's F1000 (Fortune 100) estimated electronic recordkeeping requirements for most organizations
SharePoint 2010 Out-Of-The-Box	5015.2 requirements met by SharePoint 2010 out of the box, with no customization.

US DoD 5015.2 - STD Requirements Analysis			
Requirement	Description	F1000 Requirement	SharePoint 2010 Out-of-the-Box
2.2.1 - Implementing File Plans			
2.2.1.1	File Plan Structure	✓	
Table 1 Fields 1-8	Cat name	✓	✓
T1.9	Definable Fields	✓	✓
2.2.1.2	Selection Lists	✓	✓
2.2.1.3	Metadata Edit	✓	✓
2.2.1.4	Mandatory fields	✓	✓
2.2.1.5	Container Structure	✓	
T2.1	Folder Name	✓	
T2.2	Folder ID	✓	
T2.3	Location	✓	✓
T2.4	Vital		
T2.5	Vital Review Period		
T2.6	Supplemental Marking		
T2.7	Definable Fields	✓	✓
2.2.1.8	Edit Metadata	✓	✓
2.2.1.7	Data Integrity	✓	✓
2.2.1.8	Category Linking	✓	
2.2.1.9	Metadata Alerts		
2.2.1.10	Reporting Capability	✓	✓
2.2.2 - Scheduling Records			
2.2.2.1	Edit Components	✓	
2.2.2.2	Multi-Phase	✓	✓
2.2.2.3	Parallel Phases		
2.2.2.4	Cutoff Trigger	✓	
2.2.2.5	Interim Phases	✓	✓
2.2.2.6.1	Retention Period	✓	
2.2.2.6.2	Disposition Action	✓	
2.2.2.6.3	Interim Transfer		
2.2.2.7.1	Time	✓	✓
2.2.2.7.2	Event	✓	✓
2.2.2.7.3	Time-Event	✓	✓
2.2.2.8	Multiple recurring Events		
2.2.2.9	Calculate Life Cycle	✓	
2.2.2.10	Reschedule	✓	
2.2.2.11	Recalculate Lifecycle	✓	
2.2.3 - Declaring and Filing Records			
2.2.3.1	Folder Structure	✓	✓
Table 3 Fields 1 - 13	ID	✓	✓
T3.14	Definable Fields	✓	✓
2.2.3.3	Pick Lists	✓	✓
2.2.3.4	Mandatory Fields	✓	✓
2.2.3.5	Record ID	✓	✓
2.2.3.6	Reporting Capability	✓	✓
2.2.3.7	Read-Only Record	✓	✓
2.2.3.8	Read-Only fields	✓	✓
2.2.3.9	Metadata Creation	✓	✓
2.2.3.10	Metadata Edit	✓	✓
2.2.3.11	Date Validation	✓	✓
2.2.3.12	Definable Fields	✓	✓
2.2.3.13	Reporting Capability	✓	✓
2.2.3.14	Constrain Categories	✓	
2.2.3.15	Constrain Metadata	✓	✓
2.2.3.16	Re-Classify	✓	✓
2.2.3.17	Record Linking		
2.2.3.18	Link Labelling		
2.2.3.19	Un-Link		
2.2.3.20	Link Permissions		
2.2.3.21	Renditions	✓	✓
2.2.3.22	Version Management	✓	✓

US DoD 5015.2 - STD Requirements Analysis			
Requirement	Description	F1000 Requirement	SharePoint 2010 Out-of-the-Box
2.2.3.23	Metadata Structure	✓	✓
2.2.3.24	Edit Metadata	✓	✓
2.2.3.25	Referential Integrity	✓	✓
2.2.3.26	Database Sync	✓	✓
2.2.4 - Filing Email Messages			
2.2.4.1	Manage as Records	✓	
2.2.4.2	Transmission and receipt Data	✓	
2.2.4.3	Multi-Mode	✓	
2.2.4.4	Include OLE Objects		
2.2.4.5	No external Save		
2.2.4.6	Link attachments		
2.2.4.7	DMS Header Fields		
2.2.5 - Filing Records to Transfer to NARA			
Table 5 Fields 1 -25	NARA Transfer Fields		
2.2.5.2	Font Alert		
2.2.6 - Storing Records			
2.2.6.1	DDMS compliant Portal		
2.2.6.2	Secure Access	✓	✓
2.2.6.3	Preserve Format	✓	✓
2.2.6.4	Arbitrary Delete	✓	✓
2.2.6.5	Removal Alert		
2.2.7 - Retention and Vital Records Management			
2.2.7.1 - Screening Records			
2.2.7.1.1	Reporting Capability	✓	✓
2.2.7.1.2	Qualification List	✓	
2.2.7.1.3	Re-order Display List	✓	
2.2.7.1.4	Event Recording	✓	
2.2.7.1.5	Interim Transfer List	✓	
2.2.7.1.6	Retention Reference Date	✓	
2.2.7.2 - Closing Record Folders			
2.2.7.2.1	Close Folder		
2.2.7.2.2	Reopen Folder		
2.2.7.3 - Cutting Off Record Folders			
2.2.7.3.1	Folder Cutoff		
2.2.7.3.2	Add to Cutoff Folders		
2.2.7.4 - Freezing/Unfreezing Records			
2.2.7.4.1	Freeze pre-qualified records	✓	✓
2.2.7.4.2	Freeze Reason	✓	✓
2.2.7.4.3	Unfreeze	✓	✓
2.2.7.4.4	Reporting Capability	✓	✓
2.2.7.5 - Transferring Records			
2.2.7.5.1	Transfer Qualification List	✓	
2.2.7.5.2	Transfer Records	✓	
2.2.7.5.3	Transfer Non-Electronic Documents	✓	
2.2.7.5.4	Post-Transfer deletion	✓	
2.2.7.5.5	Transfer Audit trail	✓	
2.2.7.5.6	Post-transfer bulk update	✓	
2.2.7.6 - Destroying Records			
2.2.7.6.1	Qualification List + Link	✓	
2.2.7.6.2	Double Confirmation	✓	
2.2.7.6.3	Expunge	✓	
2.2.7.6.4	Metadata Retention	✓	
2.2.7.6.5	Restricted Access	✓	✓
2.2.7.6.6	Store Audit as a record	✓	✓
2.2.7.7 - Cycling Vital Records			
2.2.7.7.1	Vital Records Review		
2.2.7.7.2	Review Date		

US DoD 5015.2 - STD Requirements Analysis			
Requirement	Description	F1000 Requirement	SharePoint 2010 Out-of-the-Box
2.2.7.7.3	Cycling Qualification List		
2.2.7.7.4	Report on Prior Cycle Date		
2.2.7.7.5	Cycle Reference Date		
2.2.7.8 - Searching for and Retrieving Records			
2.2.7.8.1	File Plan View	✓	
2.2.7.8.2	Metadata Search	✓	✓
2.2.7.8.3	Partial String Matches	✓	✓
2.2.7.8.4	Boolean Operators	✓	✓
2.2.7.8.5	Order Result List	✓	✓
2.2.7.8.6	Retrieve Record Copy	✓	✓
2.2.7.8.7	Launch Email	✓	✓
2.2.7.8.8	Launch Application	✓	✓
2.2.7.8.9	Version Display	✓	✓
2.2.7.8.10	Multi-record selection	✓	✓
2.2.7.8.11	Abort Search	✓	✓
2.2.8 - Access Controls			
2.2.8.1	Edit Roles	✓	✓
2.2.8.2	Password Default		
2.2.8.3.1	User ID	✓	✓
2.2.8.3.2	Password Default	✓	✓
2.2.8.3.3	Alternative Control		
2.2.8.4	Create Role	✓	✓
2.2.8.5	Group Access Control	✓	✓
2.2.8.6	128-bit PK Web interface	✓	✓
2.2.8.7	Multi-User Access	✓	✓
2.2.9 - System Audits			
2.2.9.1.1	User Account	✓	✓
2.2.9.1.2	Group	✓	✓
2.2.9.1.3	Record Folder	✓	✓
2.2.9.1.4	Metadata	✓	✓
2.2.9.1.5	File Plan Components	✓	
2.2.9.2	Audit Reporting	✓	✓
2.2.9.3.1	Track by User/Time		
2.2.9.3.2	Track by record handling		
2.2.9.4	File audit as record	✓	✓
2.2.9.5	Export Audit Files	✓	✓
2.2.9.6	Edit Audit Log	✓	✓
2.2.11 - System Management			
2.2.11.1	Backup		
2.2.11.2	Backup Storage		
2.2.11.3.1	Data Integrity Checks		
2.2.11.3.2	Failure Recovery		
2.2.11.4	Rebuild Capability		
2.2.11.5	Storage Monitoring		
2.2.11.6	Safeguarding		
5.1 - RMA to RMA Transfer			
5.1.1.1	Export Context		
5.1.1.2	Import Context		
5.1.2	Import/Export Custom Fields		
5.1.3.1	JITC Transfer Schema		
5.1.3.2	Custom Fields Schema		
5.1.4.1	Matadata Mapping		
5.1.4.2	Custom Field Mapping		
5.1.5	Custom Field Schema		
5.1.6	Record Elements		
Table C5.T1	Core metadata		
Table C5.T2	Email metadata		
Table C5.T3	Scanned Documents		
Table C5.T4	PDF documents		

US DoD 5015.2 - STD Requirements Analysis			
Requirement	Description	F1000 Requirement	SharePoint 2010 Out-of-the-Box
Table C5.T5	Photo documents		
Table C5.T8	Web Records		
Table C5.T11	Core Record Fields		
Table C5.T14	Lifecycle Data		
Table C5.T16	Folder Metadata		
Table C5.T17	Folder Lifecycle Metadata		
Table C5.T18	Folder Data		
Table C5.T20	Custom Folder Fields		
5.1.7.1	Document Grouping		
5.1.7.2	Read Documents		
5.1.7.3	Record Metadata		
TOTAL		168	105
			72

