Review of Records Management Practices: Final Report

Prepared for

National Energy Board

Prepared by

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Executive Summary

The objective of this report is to assess the National Energy Board's current records management practices by identifying areas at risk of not meeting legal requirements and the gap between current and best practices, and providing advice on how to address the gap. The assessment was based on criteria relating to each of the components of the records/information life cycle and the development of a model organization for comparison purposes.

The management of recorded information is accepted as a fundamental component of the NEB's knowledge management strategy and staff have an understanding of, and respect for, recordkeeping as a business activity. Unfortunately there is a gap between the desire to keep good records and the ability to do the job. The Board, for all intents and purposes, works in an electronic environment but records management practices remain focused on paper-based documents and files. Until the electronic copy has the legal status of the paper copy the Board will have to live in both worlds. This does not mean that better practices cannot be implemented. All government institutions are in the process of changing from a paper-based to an electronic environment.

While the records relating to the "court of record" are well managed, operational records are less well maintained as a corporate resource. Staff use shared drives extensively to store and access documents outside the corporate recordkeeping system; the volume of documents stored there is, as the InfoRM Charter notes, "staggering". Generally, IRAD's services lack credibility and reliability with users, with the exception of Regulatory Services. This is the result of an incomplete accountability framework for information management, a lack of adequate tools particularly in the automation of records management and a need to clarify the retention and disposition processes.

The accountability framework requirements include a new information and records management policy, with roles and responsibilities which would define the service relationship between IRAD and its clients, a competency framework for records management and a corporate IM planning capability.

The most important requirement for tools is the development and implementation of an electronic document and records management system (EDRMS) to replace the ARMIS system. This requirement is linked to the need to review the NEB classification structure with the objective of using business language to organize records and to develop a comprehensive metadata standard. Tools also include developing guidelines, procedures and advice on a number of subjects, internal desk procedures in IRAD, and a renewed Information Security Manual.

While retention schedules and disposition authorities are in relatively good order, they should be reviewed to ensure that they continue to be accurate, comprehensive and current.

There are three areas of risk with respect to compliance with federal government legislation, regulation and polices.

First, there are major gaps in the way that electronic information is captured, organized, accessed, shared and stored which point to risks in being compliant with a principal requirement of the MGIH to "plan, direct, organize and control information holdings throughout their life cycle, regardless of the form or medium in which the information is held."

Second, the current classification structure does not accommodate all of the Board's business, i.e., the records of the Frontier Group, and is not currently applied to all of its records, i.e., those not stored in the corporate recordkeeping system. In addition, the classification structure does not meet user's requirements to find and share information. This is an area of risk for the Board in complying with a principal requirement of the MGIH to "maintain a current, comprehensive and structured identification or classification system or systems that provide an effective means for organizing and locating information

and, in composite form, comprise a corporate inventory for managing the institution's information holdings."

Third, The NEB needs to identify what is essential information for its current business requirements and deal with the off-site storage of copies. Without an active essential records program, the NEB is at risk with not complying with the *Emergency Preparedness Act*.

1.0   Recordkeeping in the Knowledge Economy

In recent years we have begun to see major changes in how modern business and government are dealing with records in the knowledge economy. Changes have occurred, with deregulation and an accelerating business pace, in who is responsible for recording information, in what is being recorded and in how information is being stored and shared. Security and privacy issues have become of paramount importance. Changes are also occurring in the media used to record information. Paper records continue to play an important part in day-to-day activities, particularly for legal or official purposes, but the digital or electronic record is increasing the density and intricacy of the records environment in the workplace. The tools and techniques available to create, store, copy, organize, transmit, protect and destroy records are evolving daily. Planning and preparing for changes to the recordkeeping environment is a challenge for all organizations and individuals.

Despite the perpetual evolution of technology that continues to impact ever-changing recordkeeping practices, one thing remains a constant: records continue to serve the basic role of enabling and reflecting the continuing business enterprise - its decisions, communications and activities. A record continues to provide a myriad of purposes, from a memory aid to evidence of a particular fact (at a specific point in time), a record also affords the opportunity for staff members to share information with others.

The control of records is a fundamental business practice. Unlike other standard business functions, such as finance, everyone is involved. Sound records management practices are more economical, support informed decision-making and facilitate learning. Timely access to authoritative business records is the basis for credibility with employees, business partners, clients and stakeholders. An executive's accountability for corporate governance includes ensuring that the enterprise's records environment is aligned with business needs.

Record management practices are also mandatory requirements under law (for public and private-sector organizations). Authoritative records are essential to guarantee that the public service remains accountable to Parliament and the public. Open access to public records is fundamental to modern democracies. Accordingly, federal institutions are subject to a number of legislative, regulatory and policy requirements for records management. Under these laws, it is the responsibility of the Deputy Head to ensure that a department complies with these requirements.

2.0   Background

The National Energy Board is an independent federal regulatory tribunal established in 1959 by an Act of Parliament. It reports to Parliament through the Minister of Natural Resources Canada. The Board is a court of record. As such, the Board is bound to consider applications in a timely manner. NEB conducts oral hearings or written proceedings to hear the evidence and arguments of all parties who appear before it and then, based on that evidence and those arguments, comes

to a decision. Its acts and judicial proceedings are recorded for perpetual memory. The Board's decisions are issued as public documents.

The Board regulates the following aspects of the energy industry:

- Construction and operation of interprovincial and international oil, gas and commodity pipelines, international and designated interprovincial power lines;
- Pipeline traffic, tolls and tariffs;
- Export and import of natural gas;
- Export of oil and electricity; and
- Frontier oil and gas activities.

In addition the Board has the responsibility to advise the Minister, conduct studies, hold public inquiries and monitor supplies of major energy commodities.

The Board derives its statutory responsibilities from the *National Energy Board Act* (*NEB Act*). The Board also has responsibilities under the *Canada Oil and Gas Operations Act* (COGOA), the *Canadian Environmental Assessment Act*, the *Northern Pipeline Act*, and certain provisions of the *Canada Petroleum Resources Act*. The National Energy Board is a department under Schedule I.1 of the *Financial Administration Act* and a government institution under Schedule I of the *Access to Information and Privacy Acts* and, hence, governed by the *National Archives of Canada Act*.

The NEB is headed by a Chairman who has both a quasi-judicial role as a Board Member and a management role as the chief executive. In addition, NEB has a Vice-Chairman and up to seven other Board Members, of which there are currently five. A staff of approximately 300 persons provides technical advice, administrative and regulatory support service to the Board. The NEB is located in Calgary.

Records management at the NEB is the responsibility of the Information Management Business Unit and records services are provided by the Information Resources and Distribution (IRAD) team. The state of records management practices at the NEB has recently come under scrutiny particularly in the management of electronic records, including e-mail messages and the records collected as part of the e-filing initiative, and in the support provided to the knowledge management strategy of the Board.

3.0   Objectives

The objectives of this report are:

- To assess the Board's current records management processes, practices and procedures, identifying areas where the Board may be at risk of not meeting legal requirements;

- To identify gaps between the current state and the desired state of having records that are available, understandable, usable, complete, accurate and up-to-date throughout the life cycle of the records; and
- To provide professional advice regarding approaches that NEB management can consider to address the identified gaps.

4.0   Framework and Approach

4.1   Framework

The framework for this review of records management practices at the National Energy Board is based on the *Management of Government Information Holdings Policy* (referred to as the MGIH, revised 1994) and the *Guide to the Review of the Management of Government Information Holdings* (referred to as the MGIH Review Guide, issued in 1994). The framework follows the life cycle components for records and information:
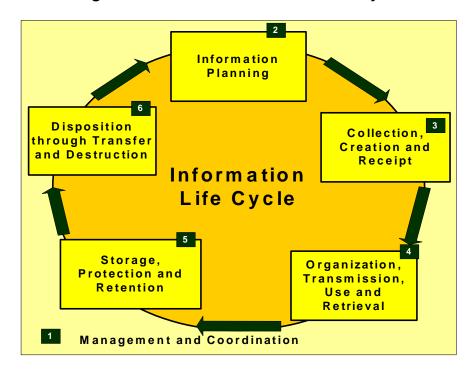
Figure 3 – The records/information life cycle

Appendix A provides a detailed summary of the objectives and criteria for each of the records/information life cycle components.

4.2   Approach

The approach for this review has focused on aspects of the records/information life cycle which help to assess records management processes, practices and procedures at the Board and not all of the criteria related to each of the records/information life cycle components has been assessed, or assessed to the same level. For instance, criteria relating to library materials and forms have not been assessed. In addition, where appropriate, an indication of the scope and the specific level of assessment have been made in Section 6 (below) under the individual life cycle component.

The results have been organized into two principal sections. The first section describes the life cycle component in a model organization. This provides a benchmark for the National Energy Board in assessing its management practices against best practices. The second section includes the findings of this review, particularly where the Board may be at risk of not meeting legal requirements, and discusses where records management practices might be improved.

The *ISO 15489 International Standard for Records Management* (2001), *Framework for the Management of Information in the Government of Canada* (referred to as the FMI), Draft *Management of Government Information Policy* (referred to as the Draft MGI, issued 2001), *Information Management Capacity Check Tool* (referred to as the IM Capacity Check Tool, August 2002.) and other sources have been consulted as guides to best practices and current and emerging trends in records management in the federal government.

The results of this report are based on information gathered through interviews with National Energy Board, National Archives of Canada and Shared System Support Centre officials and a review of relevant documentation. A list of interviewees particular to this report is included in Appendix B. A list of the documents reviewed for this report is included in Appendix C. A Guide to the Legislation and Policy Framework for Records Management is included in Appendix D.

5.0   Results

5.1   Management and Coordination

The management and coordination component of the records/information life cycle has been divided into 5 sub-components, based on the information gathered:

- RM organization and accountabilities
- IM strategic planning
- Management of electronic records
- Training and awareness
- Performance management and evaluation.

5.1.1   RM Organization and Accountabilities

Model organization:
The roles and responsibilities for the records management function are clearly defined, understood and accepted. The International Standard for Records Management states that "the overriding objective of defining responsibilities, authorities and inter-relationships is to establish and maintain a records management regime that meets the needs of internal and external stakeholders."[1] Accountability and responsibility for records management are assigned across the organization to senior management, information-based function specialists, line managers and staff. There are little or no overlaps or gaps in responsibilities. A senior official is designated to represent the organization to Treasury Board Secretariat and other central agencies for the management of information holdings.

Sufficient RM policies and standards exist within the organization. Staff are aware of, and follow, the principles and standards, and formal documentation and communication is provided.

Competencies have been assessed at the position level and competency gaps have been determined. Competency building programs are in place to address these gaps. The organization responsible for the records management function has sufficient resources, with the required skills in place, to support service delivery.

Findings and opportunities for improvement:

- RM Organization

The records management function at the NEB is the responsibility of the Information Management Business Unit, which was created in the re-organization of 1997 to make the Board "more productive and effective through the strategic use of information."[2] Records services are provided by the Information Resources and Distribution (IRAD) team. The Team Leader, IRAD has a key role in records management. According to the recently re-written job description "the second major responsibility of this position is for the official records keeping of the National Energy Board. This position must ensure records management policies, procedures, standards and practices are in place, understood by all staff of the Board to the extent necessary for their responsibilities and are carried out."[3]

The Team Leader, IRAD is reviewing the IRAD organization looking at gaps in the functional areas and services, work descriptions and the knowledge and skills of existing staff. Interviewees noted that there are gaps in the management of electronic records, quality assurance for service delivery, and the advice and guidance provided on federal government legislation and regulations affecting records management. Initially, the implementation of e-filing complicated

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[1] ISO 15489. International Standard. Information and documentation – Records management. 2001.
[2] Information Management Business Unit, *Information Management Vision and Strategy Initiative* (1998).
[3] Job Description: Team Leader, Information Resources and Distribution (July 2001).

the records management processes. Staff turnover and the loss of functional expertise have been an issue.

The IRAD organization is, however, in a state of renewal. Recently a Records Coordinator position was established and filled and two new Analyst positions are being developed. In addition, IRAD staff are being cross-trained in different functions and provided with opportunities for professional training. There is recognition that a higher level of competency is required to meet current and future records management requirements and to raise the functional capacity of the organization. It should be noted that Human Resources has not yet completed the records management component of the NEB Competency Framework which would contribute to the work of developing the organization. Strategically, the Team Leader is trying to build credibility for the records organization.

- Records services

The records management services that IRAD provides include document filing and access to corporate files; the development, maintenance and application of the corporate classification structure; and the development and management of retention schedules and disposition authorities. These services are provided to all staff. It is the responsibility of staff to send documents to IRAD for filing and to access files when required. However, as will be made clear below, IRAD's services are not used consistently throughout the NEB.

Procedures between Regulatory Services and IRAD are clear and well followed for records related to the hearing process and the "court of record" responsibilities of the Board. Regulatory Services maintains a good relationship with IRAD, holding regular meetings with all internal NEB organizations that provide services to them. These meetings help to define roles and responsibilities, discuss issues and maintain contact. Although there have been incidents where records have been lost or cannot be easily located, these incidents are not common.

For records relating to policy development, research and analysis, studies and reports, and other NEB business such as monitoring, inspections and accident investigations, there is an overall lack of confidence in IRAD services to file documents appropriately and to retrieve files in a timely fashion. On the whole, employees in Applications, Operations and Commodities do not use IRAD for managing their active information. Access to active information is handled on shared-drives, through individual databases, by e-mail, or in individual filing cabinets. It is common to box files, when they are no longer active, and send them to IRAD. IRAD has become, therefore, the repository of semi-active or historical information. Even Regulatory Services maintains active files for six months in their own area before sending them to IRAD.

The Exploration and Production team (also known as the "Frontier Group") manage their records separately from IRAD. They became part of the NEB when the Canadian Oil and Gas Lands Agency combined with the Board in 1991. Their records have yet to be fully integrated into the NEB filing system. COGOA applications are registered in IRAD and decisions are filed there, but the Frontier Group maintains their own technical files, as they require a high degree of technical knowledge to manage.

Legal Services have set up their own companion files to those maintained in IRAD. These files contain all the legal-related documentation and do not duplicate documentation filed in IRAD. Legal Services maintains their files as long as they are active and then forwards them to IRAD.

The administrative functions in Corporate Services have found that service from IRAD is poor. Human Resources maintain their own files. This is a common practice in government institutions since the secure handling of personal information is a key issue. Nevertheless they would like more direction on standards and practices from IRAD. Supply Management and Finance also maintain their own files. The administrative functions, in general, keep files centrally within their office areas, when shared access is necessary. They also maintain files, often related to policy development, in individual offices and there is a concern that these should be more centrally managed owing to the potential loss of corporate memory.

- Service model for records management

There are essentially two models for corporate records management services that can be referred to: the first is where recordkeeping functions are highly centralized and the second is where they are widely delegated. The first, and more traditional, model has a corporate records organization responsible for providing policies, standards and guidelines, scheduling and disposition, and direct services to clients such as classifying, filing and retrieval. This is the model that appears to be accepted at the NEB, although it is not widely practiced. The second model has a corporate records organization responsible for developing and maintaining policies, standards and guidelines and managing the scheduling and disposition program, but delegates classification, filing and retrieval to business units.

The second model requires a higher degree of awareness, training and monitoring from the corporate records organization but, in return, business units manage their information in the context of their business processes. If cost recovery or cost transfer is established, a large part of the cost of information management – particularly where specialized recordkeeping staff are involved – becomes a direct cost of doing business. The second model is the only workable model for electronic records and document management since classification, filing and retrieval is done at the individual's desktop.

A third option, which is a hybrid between the two models, concentrates on the service relationship between the service provider (IRAD) and the service users (NEB internal organizations). The relationship should exist in a framework of service standards (a list of defined services and a quality assurance regime) and a service agreement (which sets out the terms and conditions for the service relationship). A good service agreement provides a clear point of contact for service delivery. It could also accommodate, for instance, the need for classifiers and information officers with a specialized knowledge of a business area who could be attached to, or even co-located with, the organizational unit.

- Accountability framework

It is evident from the fragmentation of files and filing systems and the lack of clear understanding within NEB about the services provided by IRAD that roles and responsibilities for records management at the Board are not clearly defined nor adhered to. Section 26 of the Policy and Procedures Manual[4] and the "Policy Statements and Objectives" in the Records Management Services User Guide[5] are inadequate and out of date. They provide guidance on the roles and responsibilities of Records Management Services and Branches but do not provide direction at various levels throughout the organization.

The absence of a formal accountability framework means that the NEB management structure is unable to ensure the effective coordination of all information-based functions. An approved and implemented organizational-specific policy for information and records management (IM/RM) would define principles and common practices, link to appropriate standards and delineate responsibilities for senior managers, the organizational IM/RM functional Office of Primary Interest (OPI), Responsibility Centre (RC) managers and employees/contractors. These roles are referred to in the MGIH. A model IM/RM roles and responsibilities matrix, which follows the hybrid model or third option described above, is provided in Appendix E.

- Designated official

The MGIH specifically requires that a senior official be designated to represent the deputy head to Treasury Board Secretariat and other central agencies for the purposes of the policy. While documentation of an official designation was not brought to our attention, it was understood by senior officials that the designated official is the Business Leader for Information Management.

5.1.2   IM Strategic Planning

Model organization:
Strategic IM/IT planning, which ensures the coordinated management of all information-based functions and leads to improved services and better program delivery, is in place. The fundamental objectives of the MGIH and the Management of Information Technology policy are supported. The organization benefits because its information management practices keep pace with, and maximize the investment in, the Corporation's knowledge assets and it continues to develop and implement an information environment that truly reflects its business information requirements.

There is recognition of information as a strategic corporate resource and widespread recognition throughout the organization of its value. Senior management is committed to, and supportive of, IM and improving IM practices. A formal mechanism to facilitate the adoption of change with IM and methodologies for environmental scanning are in place. IM functional plans are

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[4] Records Management Policy and Procedures Manual.
[5] Records Management Services, *User Guide*, July 1993.

developed with strategic priorities, desired results, resource allocation and a monitoring framework.

<u>Findings and opportunities for improvement</u>:

- IM/IT planning

Records management is acknowledged as a foundation for the NEB's knowledge management strategy since knowledge is stored in records and can be shared and leveraged by their effective management. The NEB, as an organization, is moving away from being reactive to being more strategic and needs an information environment that is current, comprehensive, reliable, dynamic and easily searched. As one interviewee put it: "Look at the recent Columbus disaster and the reaction of NASA. They were reporting to the public within minutes using their data on what might have caused the incident. NASA, and other organizations in the business of public safety, have raised the bar and increased public expectations for faster and more accurate knowledge and response." Good records management practices can make a strategic contribution to meeting those expectations.

IM and IT planning at the Board, however, is not sufficiently integrated or comprehensive to incorporate the benefits of good records management practices. The IT Advisory Committee (ITAC) reports to the IT Executive Board (ITEB) on priorities for application development based on business cases and standard methodologies but does not address the management of the information content as a corporate resource. It was noted that information requirements are an afterthought in the business planning process and not designed in at the beginning. This is reflected in the lack of integration across information zones, the duplication of information processes and the poor documentation of internal business processes. IRAD, as the functional lead on records management, is recognized as a stakeholder in the e-filing project. The IRAD Team Leader is also member of ITAC and is participating in several other IM/IT initiatives but is not, necessarily, included in all IM projects. While the InfoRM project is, in effect, a strategy to harness the Board's information resources towards strategic, knowledge management objectives, the NEB should widen the mandate of the ITAC, or put in place an appropriate forum, to include corporate IM planning responsibilities, and ensure IRAD is included as a stakeholder in IM initiatives.

- IM Capacity Check Tool

The assessment of IM strategic planning elements is not a focus of this review. It does not provide the kind of in-depth analysis which would result from undertaking an IM capacity check. The *IM Capacity Check Tool*, which has been recently developed and piloted by the National Archives of Canada, is a comprehensive self-assessment tool that government institutions can use to assess the full range of information management capacities against generally accepted best practices.

The benefits of undertaking the IM capacity check include benchmarking IM practices in order to gauge progress over time, developing IM capacity at the Board by participating in a highly-interactive process which includes senior decision-makers, using the opportunity to build awareness and communicate about IM and, most importantly, developing an action plan based on a solid understanding of the gaps in the information environment.

5.1.3   Management of Electronic Records

Model organization:
Staff working in an electronic environment have access to the tools and techniques to manage records created or collected in their original medium throughout their life cycle. Records are organized and managed in repositories that protect their integrity and authenticity, permit the use of complex search methodologies and limit duplication. Metadata is managed so that the full context of the record is maintained. Records are retained for as long as they are useful and disposed of according to federal government policies and legislation. Employees at all levels are exposed to tools and techniques, are trained to use them and are actively using them. Technology integration architecture has been defined for supporting organization-wide IM initiatives and information is integrated, or is planned to be integrated, across IM platforms.

Findings and opportunities for improvement:
Electronic information is used widely in the day-to-day operations of the NEB. Staff, administrators, and managers use electronic systems such as word processing, e-mail, spreadsheets, databases, and the intranet, hard drives and shared drives, to create, store, access and share information. Administrative systems, which manage finance and human resources transactions, are exclusively electronic. The information environment is progressively more electronic and core information is being managed in such a way that, for the most part, the organization's daily business activities continue to run smoothly. Nevertheless, there are major gaps in the way that electronic information is captured, organized, accessed, shared and stored which point to risks in being compliant with the MGIH.

- E-mail

E-mail is used widely by Board staff as a primary means to share, store and access information. E-mail messages are useful because they contain essential metadata[6] such as date and author and even more context can be provided to attachments in the body of the message such as the purpose or version. Personal e-mail directories can be organized around business functions and/or subjects and are easily searched. Unfortunately e-mail messages with corporate information are not regularly filed in the corporate records system and multiple copies are stored on various drives. In a recent study at Transport Canada[7] it was estimated that corporate e-mail

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[6] "Metadata is data describing context, content and structure of records and their management through time." *ISO 15489 International Standard for Records Management*.

[7] *RDIMS Implementation at Transport Canada: Case Study*. Special Briefing to the RDIMS Board of Directors, January 2003.

accounts for 50% of stored data in their automated document and records management system. The NEB booklet *Tips for Effective E-mail Use* provides advice on records management practices including an explanation of the difference between official and transitory e-mails and instructions on how to file e-mail messages to IRAD through the "PUTAWAY" address. This advice should be made more widely available on the NEB intranet.

- Shared drives

The use or mis-use of the Board's shared drives is seen as a principal business driver for knowledge management renewal at the NEB. Specifically, the Draft Project Charter notes the "inability to benefit from the extremely large silos of unstructured information due to the prolific and uncontrolled use of the H:, F: and G: drives."[8] There are no corporate directives, business rules or best practices on how to use shared drives which has resulted in large-scale duplication and, ironically, a lack of horizontal access. Staff suspect that the drives are close to being full and, since there is no direction on how the information will be archived, are concerned that valuable information may be deleted. The HR group has developed some internal business rules or procedures for undertaking a clean up and the on-going management of their space on the F: drive. There are rules for file naming, changing and deletion and responsibilities for document authors, including the filing of hard copies in IRAD files. NEB-wide business rules or best practices for the use of shared drives should be developed and made accessible on the NEB intranet.

- NEB intranet

The NEB intranet, Iweb, is a primary tool for sharing corporate information. A recent study of the NEB Safety and Environmental System recommended that documentation should be placed on the intranet so that it is accessible to all employees.[9] Corporate Services has had a three-year project to put policies on line. While problems with the links to documents on the G: drive and the integrity of the information on line have been noted, IRAD should exploit the intranet to disseminate policies, roles and responsibilities, business rules, best practices, service standards and IRAD contacts and communicate with its NEB clients.

- Administrative and operational systems

There is a multitude of electronic tools in place to support the Board's administrative and operational needs. Administrative systems include the HRIS (Human Resources Information System), FreeBalance (financial functions) and the asset tracking system. Legal Services have I-manage which is a database of all their legal opinions. Operational systems include the ESIMS (Environmental and Safety Information Management System), PID (Pipeline Incident Database), PTS (Project Tracking System), ELXIM and the "Frontier database". Since these tools are not linked, they do not support access to information across business lines. From a records perspective there are two concerns: the opportunity for duplication and the lack of integration,

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[8] National Energy Board, *Knowledge Management Renewal Program: Planning Project Charter (draft)*, October 2002.
[9] *NEB Safety and Environmental Management System ISO Gap Analysis*, 2002.

however, it is beyond the scope of this review to examine these tools in detail. Similar concerns are raised in the Draft Project Charter for the KM Renewal Program and technology integration should be a factor in the draft IT Strategy (which was not reviewed here).

- E-filing

E-filing is a major initiative which, initially, had a profound effect on the management of records at the Board. IRAD provides administrative support to the e-filing process. The paper copy for documents submitted remains the Board's official copy, as a Public Key Infrastructure component for electronic signatures has not been developed for e-filing. This has resulted in the maintenance of two parallel systems, the paper file is maintained for official purposes and the electronic file is maintained for access and dissemination. The e-filing site has a better search capability than the records system and it was noted that a major user of the site are NEB employees themselves. NEB staff are becoming progressively dependent on the web-based records and it is seen as a valuable tool. The administration of e-filing information, however, initially put stress on IRAD staff who did not, necessarily, have the competencies to fully participate. It also has drawn away resources from the delivery of paper-based record services. This has contributed to a lowering of the quality of the IRAD services to both e-filing and to paper-file management.

- Automated Records Management and Information System (ARMIS)

ARMIS is the core, automated tool used by IRAD for the management of paper-based documents and files. ARMIS is a custom-built application for records management that has outlived its usefulness. It provides some records management functionality but does not manage electronic records and does not include even basic requirements such as scheduling and retention. The system cannot track files or delete records, will not allow changes to the classification structure and produces unusable labels. In addition, frequent system crashes and the inability to make changes to its functionality mean that it is unreliable and inflexible.

- Electronic documents and records management system (EDRMS)

In summary, the following conditions all point to the need for a fully automated (EDRMS):

- The widespread use of electronic information;
- Poor control over electronic information such as e-mail and documents stored on shared drives;
- Large scale duplication of records;
- Inability to provide horizontal access to, and sharing of, information across the organization; and
- Continuing need to manage paper-based files in an automated system.

These conditions also point to risks in complying with a principal requirement of the MGIH to "plan, direct, organize and control information holdings throughout their life cycle, regardless of the form or medium in which the information is held."

In conclusion, the NEB should develop a business case, including an examination of the functional and technical requirements, to put in place the functionality required to support automated document and records management. This may well be integrated, linked or incorporated with a knowledge or information management strategy. It is understood that funds to study the development of an EDRMS have been included in the coming year's budget.

It may be that the Records, Document and Information Management System, (RDIMS), which is part of the federal government's Shared Systems Initiative, meets the Board's requirements. RDIMS goal is to provide a means to facilitate the process of capturing, storing, organizing, sharing, retrieving, re-using, protecting and disposing of information in an electronic environment regardless of format and without geographic or organizational barriers. Increasingly RDIMS is being implemented across government. For further information see: http://www.rdims.gc.ca/about/index_e.html

5.1.4   Training and Awareness

Model organization:
A user awareness program has been developed and mechanisms are in place to make relevant records management products (i.e., policies, standards, procedures and tools) and services visible to users. Users know what relevant information exists for their needs and where to find and access it. Users are aware of the service standards for records management service delivery. A formal training program for the use of RM technologies and practices has been developed and implemented.

Findings and opportunities for improvement:

- Advice and guidance

While there is a strong awareness among the staff of the NEB of the value of information as a business asset and the need to collect, organize and preserve it, the lack of sufficient corporate direction in the form of policies, standards and guidelines has resulted in low level of awareness about acceptable recordkeeping practices. The development of business rules and a comprehensive program to nurture and support awareness of good recordkeeping practices is required to sustain the ability of the Board to manage all information holdings as a corporate resource, a fundamental premise of the MGIH. Strong recordkeeping practices are particularly necessary should the Board decide to follow the model for records management services where the responsibility for classifying, filing and retrieving information is delegated to individuals.

Specifically, direction is required on the filing of e-mails and other electronic documents, since there is no EDRMS in place, and in determining what records need to be kept (i.e., filed in the corporate system) and what records do not need to be kept (i.e., are treated as transitory). Business rules for the handling of drafts or versions should be developed to provide guidance to corporation employees in filing records.

Guidelines and procedures on recordkeeping should be developed and made readily available to users in a variety of formats. Presentations, which are part of an employee orientation program or provided to business units on demand, are a useful tool to introduce good practices and records management staff to employees. Business rules posted on the corporation's intranet provide easy access and the ability to quickly update. Quick Reference Guides such as photocopied pamphlets on issues such as "transitory information" or "how to manage e-mail" can provide another vehicle for getting to the user. A good example of a useful tool is the "User's Guide to Records Keeping at PCO". It provides everything from basic definitions to an explanation of the records life cycle and the legislation and regulations that affect it. A copy has been provided to the Team Leader, IRAD.

- Training

Formal training programs to improve recordkeeping practices, which provide concentrated, hands-on instruction, are likely more successful if they are tied to the introduction of new practices, such as the implementation of an EDRMS or a new file classification structure, than if they are delivered on an ad-hoc basis.

5.1.5   Performance Management and Evaluation

Model organization:
Performance measures for records management have been agreed upon and communicated. They follow a balance scorecard approach and include financial, learning, client and business process measures. The audit and review process for records management ensures an adequate level of awareness and compliance with applicable legislation, policies and standards.

Findings and opportunities for improvement:
There is no formal, on-going evaluation of the records management program at the NEB. Rigorous measurement tools have not been available to government institutions and it is a difficult environment to evaluate without them. The MGIH provides little direction on the ongoing monitoring of records management program performance except to note that compliance with the policy should be monitored through departmental internal audit reports. This report has been commissioned by the Manager, Audit and Evaluation and is based on the MGIH Review Guide's framework to assist auditors and evaluators in conducting formal reviews of the management of government information.

The implementation of the new Management of Government Information (MGI) policy, which is nearing approval, should provide guidance to government institutions in measuring their

performance against the policy's requirements. In addition, the *IM Capacity Check Tool*, which is described above under Section 5.1.2, has been recently developed and piloted by the National Archives of Canada. It is a comprehensive self-assessment tool that government institutions can use to assess the full range of information management capacities against generally accepted best practices.

5.2   Information Planning

Model organization:
Information holdings meet the operational needs of the institution and satisfy legislative and policy requirements. Information management requirements are identified for operational, legislative and policy purposes and formally incorporated in the planning process of policies, programs, services and systems. Planning applies to all information regardless of format (paper or electronic). To the extent that is practical, opportunities to maximize the use of technology are assessed and IM system interoperability is regularly identified.

Findings and opportunities for improvement:
Information planning, in the context of the MGIH, relates principally to a corporate assessment of the information required by the institution to support its programs and activities. Although it is beyond the scope of this review to document in detail the extent to which information holdings meet the administrative and operational needs of the Department and satisfy legislative and policy requirements, there was little or no indication that current information holdings do not meet these requirements. In one instance, the need for access to information on the policy development continuum was noted. Briefing type of information, some even historical in nature, is particularly important in supporting the continuity of decision-making. This information is not easily found, unless someone has kept the documents in their personal files, because it has not been regularly captured, described and retained in the corporate recordkeeping system. In addition, given that information resides in many repositories in both paper and electronic formats throughout the organization, it is likely that considerable duplication occurs.

The need to make business processes more explicit and to document them was noted by interviewees. The Draft MGI contains a policy requirement referred to as "the duty to document" which means that, once the policy is approved, government institutions will need to fully understand their business functions, activities and transactions to ensure that decisions are documented and that records are captured, organized and retained.

The MGIH also looks to information planning to assess opportunities for information technology applications and IM system interoperability. The draft IT Strategy (which was not reviewed here) may provide direction in this area. A common objective of IM/IT planning is to develop and implement an information environment that truly reflects the business information requirements of the organization. Section 5.1.2 above on IM Strategic Planning provides more discussion related to IM planning and notes the recommendation to include IRAD, as the OPI for the records management function, as a stakeholder in all IM initiatives.

5.3   Collection, Creation and Receipt

Model organization:
Information creation and collection is planned and undertaken efficiently and effectively, in accordance with legal and policy obligations. It is created or collected to support program and service delivery and decision-making, document decisions and the decision-making process and avoid the unnecessary collection of information. Stakeholders are aware of the organization's information collection principles, policies and standards.

Findings and opportunities for improvement:
Recordkeeping related to the court of record of the National Energy Board is planned and monitored. Hearing process records are collected and created according to documented procedures. A Regulatory Officer is responsible for recordkeeping. Every exhibit document is put in the system as part of the official transcript. A Hearing Manual is in development which will describe the entire Hearing process and define roles and responsibilities. For each Board meeting a separate file with the agenda, minutes and documents relating to each of the agenda items is maintained. Files contain the original, signed copies of the documents for legal purposes.

For the e-filing component, a Filers Guide[10] is available which describes the process and guidelines for submitting documents to the NEB. There is a repository of documentation on line for public access. Interviewees noted however that there is a need for a more transparent records system such as a tracking system on line for the application process, with documents attached to it. This would provide up front advice to clients on the Board's procedures and service standards on the processing time for applications.

There is less formal control over the creation and collection of records related to the policy development, research and analysis, studies and reports, and other NEB business. Few of the business processes appear to be documented or mapped and there does not appear to be a great deal of linking or integration between processes. However, this review did not focus on an examination of individual processes, except to map the Pre-hearing process and the process to develop Energy Market Assessments in Commodities Business Unit. Appendix F provides these process maps. Further examination of business processes, their information inputs and outputs and the functions they relate to, would provide the NEB with a greater awareness of the efficiency and effectiveness of its information collection and creation.

5.4   Organization, Transmission, Use and Retrieval

Model organization:
Formally accepted methods and tools for organizing, using and disseminating information are in place and used throughout the organization. This includes methods and tools for the management of paper files and electronic records. Information assets are available to users and easily

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[10] Filers Guide to Electronic Submission, May 2002.

accessible, using a number of search mechanisms, in a timely and convenient way. Opportunities for sharing and re-use are identified both internally and externally.

<u>Findings and opportunities for improvement</u>:

- Records classification structures

The records classification structure is a fundamental tool for organizing and describing records. It responds to two key functions: providing access to records for their re-use and sharing and describing records so that they can be scheduled for retention purposes and disposed of. The current NEB classification structure is based on the Subject Block Numeric System and was developed some twenty years ago. Unfortunately it has not been maintained and no longer accurately reflects the whole organization. In addition, the structure does not meet current needs for accessing the records.

A good classification structure should reflect the functions, activities and transactions of the organization and be built using a language that is familiar to the organization's staff. It should be simple and flexible, and the categories should be mutually exclusive allowing for no overlap between files headings. The NEB classification structure is generally based on the *NEB Act* and the Frontier Group records do not fit into it. The use of colour codes, which act like a "super code", on IRAD files indicates that the current structure does not adequately reflect the functions of the organization.

While users become familiar with the codes and files that they deal with regularly, there was general agreement that the classification system is not an effective working tool. Users want to use natural language in retrieving files and the non-linear access which the Internet provides. They need subject access to briefing notes and issues that relate to more than one company and they need to link documents such as Board decisions and Board items and track links through changes in company ownership. A Geographical Information System (GIS)-type designation has been discussed by the Operations Compliance group as a means of accessing information that might help them determine trends or deal with landowner issues. Users of automated systems such as e-mail or shared drives are familiar with multi-dimensional search capabilities which go beyond what a classification structure can supply and are disappointed, therefore, in the limited capacity of the block-numeric structure. This expectation is reflected in the MGIH and its requirement that holdings be organized in order to make the widest possible use of the information.

The NEB classification structure would benefit from a review in light of the current approach to a function or business-activity based classification structure. The National Archives is in the process of providing advice to government institutions on this new approach. A function-based approach would identify and describe information in a business context that is more meaningful to users. In addition, common subject terms may need to be developed to enhance usability. The review of the file classification structure should be done in the context of the development and

implementation of an EDRMS. User requirements for access to records should be documented as part of this review.

There are also two previous classification structures which must be used in order to access older NEB files, which have been transferred to the custody of the National Archives. These systems have not been converted or linked to the current classification structure and are difficult to use. Legal Services have developed ad-hoc finding aids to use these records since the older files on Acts and Regulations, for instance, are a very important resource for them. A determination should be made by assessing the cost and efficiency of developing links between these older systems and the current, or possibly new, structure.

- Metadata standard

A full metadata standard, which would include elements to maintain the business context of documents and subject terms, will also need to be developed for an EDRMS. This is an important value that an EDRMS can add to the information environment. EDRMS with metadata management and a good search capability will greatly increase the ability to share information and locate records.

- Application of the classification structure

The use of IRAD for filing and accessing active information is not consistent. It is primarily a repository of inactive information. Users have found that they cannot locate documents that they have sent for filing. This is the result of a number of elements including an inadequate classification structure, subject matter that is too specialized or technical for classifiers, and poor filing practices. Users are oriented towards working electronically and using shared drives to store and access common electronic records, although the information is poorly organized and can be difficult to locate. To improve the reliability of IRAD services desk procedures in the Records Management Policy and Procedures Manual should be reviewed and revised, IRAD staff should be trained, and a quality assurance process should be put in place.

The NEB classification structure is applied only to records in the custody of IRAD which leaves much of the recorded information outside the corporate records inventory and, therefore, difficult to schedule and dispose of legally. This is an area of risk for the Board in complying with the MGIH requirement to "maintain a current, comprehensive and structured identification or classification system or systems that provide an effective means for organizing and locating information and, in composite form, comprise a corporate inventory for managing the institution's information holdings."

- Transitory records

Finally, the handling of transitory information is inconsistent at the NEB. It is unclear, for instance, to staff which e-mails can be deleted and which should be printed and filed. It is also unclear as to which drafts of documents need to be kept. Overall, there is a lack of awareness on the handling of transitory records, that is, "records that are required only for a limited time to

ensure the completion of a routine action or the preparation of a subsequent record."[11] Advice and guidance should also be provided to staff on the identification and handling of transitory records.

5.5   Storage, Protection and Retention

Model organization:
The organization has developed an approach that incorporates established principles for maintaining and preserving information, regardless of format. These are communicated to internal users, and some external stakeholders. Information is maintained while it has operational value in terms of supporting decision-making, program operations and service delivery and while it is required to meet legislative and policy requirements. Information of enduring value to the Government of Canada has been identified and steps taken to ensure its long-term availability. Consideration has been given to the impact technological change may have on the usability of information.

Findings and opportunities for improvement:

- Storage space

The need for the NEB to use its current space allotment for office accommodation has put pressure on IRAD to look closely at its storage of records. The storage areas have been re-organized to make the best use of the available space and an off-site storage area has been secured for storing records that are not accessed often. Formal standards for paper file storage have not been developed but IRAD has prepared brief guidelines for boxing and labeling files. IRAD keeps in good communication with clients with respect to the storage of their records. IRAD should put its boxing and filing instructions and the criteria used for near and off-site storage on the NEB intranet.

- Retention scheduling

The NEB has the requirements for long retention periods to maintain records for operation and policy purposes. The Frontier Group's technical files, for instance, are retained for 40 years before being transferred to the control of the National Archives where they are kept indefinitely. The overall situation with records schedules is unknown as information on them is scattered among a number of files and locations in IRAD. Scheduling is active for administrative records, which are government by the Retention Guidelines for Common Administrative Records, and records from the Frontier Group and Regulatory Services. IRAD should gather all information on into one, organized location and review the status of schedules.

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[11] *Authority for the Destruction of Transitory Records*. National Archives of Canada.

Given the required for access to corporate information over a long time, the relationship with the National Archives, which has NEB records in their custody and under their control, must be managed closely. The difficulty with locating the records using the older classification systems has been discussed above. IRAD has lists for each of the accessions, or groups of records, transferred to the National Archives but there have been concerns with files returned from the Federal Records Centres (FRC) in poor shape, with boxes broken and the appearance of mould. IRAD staff noted that it was "cumbersome to access and retrieve records" from the NA which holds the NEB's records in three locations: Edmonton, Winnipeg and Ottawa. IRAD may want to look closely at the procedures used between the NEB and the NA see if improvements can be made.

Procedures are in place to ensure that electronic files are backed up, if they are maintained on shared drives. Back-up tapes are made nightly of networked information and shipped weekly to the FRC in Edmonton.

- Information security

Information is safeguarded at the NEB according to the Government Security Policy. The documents are handled and stored appropriately and no security-related incidents were noted. HR, for instance, keeps their files in two separate rooms with key codes and access limited to those who need to know. Awareness about the protection of personal information in the HR group is very high. Cabinet Confidences are stored according to government regulations. Staff asked for better guidelines on the classification and designation of information. Procedures on the de-classification of information were also needed. There is a particular need to separate the material which cannot be released under Section 16.1 of the *NEB Act* from material that must be published for the public. The Information Security Manual is not current and should be made available on the NEB intranet. Regular alerts are posted on the intranet or e-mailed to staff, however, it was noted that these were not sufficient and that a security awareness program was needed to improve information security.

- Essential records program

Government institutions are responsible for identifying, selecting and protecting those records and data holdings that are considered essential to meeting operational responsibilities during and after emergency conditions. An essential records program is part of an institution's disaster recovery plan or business continuity plan. An IRAD Recovery Guide has just been completed as part of the NEB Business Continuity Plan. This is a detailed guide, providing salvage procedures for instance, to developing a Disaster Recovery Plan for IRAD. While off-site back up of information systems is in place, this does not constitute an essential records program The NEB still needs to identify what is essential information for its current business requirements and deal with the off-site storage of copies. Without an active essential records program, the NEB is at risk with not complying with the *Emergency Preparedness Act*.

An EDRMS would automate the essential records process for both paper and electronic records. For instance, all three of the records management software solutions in the RDIMS (iRIMS,

Foremost and Hummingbird RM) have the capacity to declare documents as essential records. They can also identify and manage "events" associated with those documents such as location, changes to status and bring forward.

5.6   Disposition through Transfer or Destruction

<u>Model organization</u>:
A formal set of principles, policies and standards for disposing of information which adhere to legal and policy obligations are in place. These principles, policies and standards are in widespread use throughout the organization, and with key stakeholders and clients. The organization has comprehensive coverage of Records Disposition Authorities for all records under its control.

<u>Findings and opportunities for improvement</u>:
Information on NEB disposition authorities is scattered among a number of files and locations in IRAD. As noted above, IRAD should gather all information on scheduling and disposition into one, organized location for reference purposes. From the perspective of the National Archives, the NEB appears to be in relatively good shape with respect to its disposition authorities.

A Multi-Year Disposition Plan (MYDP), which is an agreement between the NEB and the National Archives to manage the development and implementation of disposition authorities over a multi-year period, is in place but the NEB should consider re-negotiating it with the National Archives in order to review the status of existing disposition authorities, ensure that they continue to be accurate and current, and ensure that all NEB records are covered. Some of the existing NEB authorities date to the 1970s and are probably no longer current.

6.0   Conclusions

The management of recorded information is accepted as a fundamental component of the National Energy Board's knowledge management strategy and staff have an understanding of, and respect for, recordkeeping as a business activity. Unfortunately there is a gap between the desire to keep good records and the ability to do the job. The Board, for all intents and purposes, works in an electronic environment but records management practices remain focused on paper-based documents and files. Until the electronic copy has the legal status of the paper copy the Board will have to live in both worlds. This does not mean that better practices cannot be implemented. All government institutions are in the process of changing from a paper-based to an electronic environment. The National Archives believes that parallel recordkeeping systems could be in place for the next 20 years.

While the official records of the Board are well managed, operational records are less well maintained as a corporate resource. Staff use shared drives extensively to store and access documents outside the corporate recordkeeping system; the volume of documents stored there is,

as the InfoRM Charter notes, "staggering".[12] Generally, IRAD's services lack credibility and reliability with users, with the exception of Regulatory Services. This is the result of an incomplete accountability framework for information management, a lack of adequate tools particularly in the automation of records management and a need to clarify the retention and disposition processes.

The accountability framework requirements include a new information and records management policy, with roles and responsibilities which would define the service relationship between IRAD and its clients, a competency framework for records management and a corporate IM planning capability.

The most important requirement for tools is the development and implementation of an electronic document and records management system (EDRMS) to replace the ARMIS system. This requirement is linked to the need to review the NEB classification structure with the objective of using business language to organize records and to develop a comprehensive metadata standard. Tools also include developing guidelines, procedures and advice on a number of subjects, internal desk procedures in IRAD, and a renewed Information Security Manual.

While retention schedules and disposition authorities are in relatively good order, they should be reviewed to ensure that they continue to be accurate, comprehensive and current.

There are three areas of risk with respect to compliance with federal government legislation, regulation and polices.

First, there are major gaps in the way that electronic information is captured, organized, accessed, shared and stored which point to risks in being compliant with a principal requirement of the MGIH to "plan, direct, organize and control information holdings throughout their life cycle, regardless of the form or medium in which the information is held."

Second, the current classification structure does not accommodate all of the Board's business and is not currently applied to all of its records, i.e. those not stored in the corporate recordkeeping system. In addition, the classification structure does not meet user's requirements to find and share information. This is an area of risk for the Board in complying with a principal requirement of the MGIH to "maintain a current, comprehensive and structured identification or classification system or systems that provide an effective means for organizing and locating information and, in composite form, comprise a corporate inventory for managing the institution's information holdings."

Third, The NEB needs to identify what is essential information for its current business requirements and deal with the off-site storage of copies. Without an active essential records program, the NEB is at risk with not complying with the *Emergency Preparedness Act*.

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[12] National Energy Board, *Knowledge Management Renewal Program: Planning Project Charter (draft)*, October 2002.

7.0   Recommendations

- Accountability Framework:

    - Complete the Competency Framework for RM and put in place a formal training and development program for IRAD staff to fill gaps and improve competencies;
    - Consider implementing the hybrid service model for records management which manages the service relationship between IRAD, the service provider, and the NEB internal organizations, the service users, using service standards and service level agreements;
    - Develop and promulgate a new policy for information and records management (IM/RM), based on the accepted service model, which would define principles and common practices, link to appropriate standards and delineate roles and responsibilities;
    - Change the mandate of the Information Technology Advisory Committee, or put in place an appropriate forum, to include corporate IM planning responsibilities;
    - Include IRAD as a stakeholder in all IM initiatives;
    - Consider undertaking a organizational self-assessment of the information environment by using the *IM Capacity Check Tool*;

- Tools:

    - Develop a business case, including an examination of the functional and technical requirements, to put in place the functionality required to support automated document and records management. This may well be integrated, linked or incorporated with a knowledge or information management strategy.
    - Develop advice and guidance on good records management practices related to the filing of electronic documents and e-mail, the handling of drafts, versions and transitory information, the management of duplicate files, the management of shared drives and the listing, boxing and storage of in-active records, and make them readily available to users in a variety of formats as part of an program to increase awareness;
    - Review and revise desk procedures in the Records Management Policy and Procedures manual, provide training to IRAD staff, and put in place a quality assurance process, to improve the reliability of IRAD services.
    - Review the Information Security Manual, ensure that it includes guidelines on the classification and designation of information and the de-classification of information, and make it available on the NEB intranet.
    - Consider the examination of business processes, their information inputs and outputs and the functions they relate to. Process mapping would provide the NEB with a greater awareness of the efficiency and effectiveness of its information collection and creation.
    - Review the NEB classification structure and the requirement for corporation-specific metadata standard in the context of the development and implementation

of an EDRMS. Determine if links should be made to the NEB's two older classification structures.

- Retention and disposition:

    - Consider a review of the operational procedures used between the NEB and the NA to see if improvements can be made in the service relationship.
    - Gather all information on scheduling and disposition into one, organized location in IRAD and review the status of schedules and disposition authorities, in the context of a revised MYDP, with the National Archives representative.
    - Develop an essential records program as a component of the NEB Business Continuity Plan.

Appendix A – MGIH Review

Guide Framework for

Records Management Practices

The *Guide to the Review of the Management of Government Information Holdings* was issued in 1994 by the Treasury Board Secretariat to help managers and staff assess the management of government information holdings in their own institutions. The Guide was also developed to help auditors and evaluators conduct formal reviews of the management of government information.

Information holdings, as defined by the Management of Government Information Holdings policy, are defined as "all information under the control of a government institution, regardless of physical mode or medium in which such information may be stored." This definition includes library materials. The following framework, based on the Guide, has been developed to focus only on records management practices.

2.1   Management and Coordination

The objectives for this component are that the institution's management structure facilitates effective coordination of all information-based functions and ensures that the coordinated management of its information-based functions leads to improved services and better program delivery.

The MGIH Review Guide has established five criteria for assessing the effectiveness of the management and coordination function:

1.   Accountability and responsibility for the management of information are assigned across the organization to senior management, information-based function specialists, line managers and staff.
2.   A senior official is designated to represent the institution to Treasury Board Secretariat and other central agencies for the management of information holdings.
3.   Linkages and common goals/needs among information-based functions are identified.
4.   Plans are established for the support requirements of information holdings in all media.
5.   A corporate inventory is maintained for managing the institution's information holdings.

2.2   Information Planning

The objective for this component is that the information holdings meet the operational needs of the institution and satisfy legislative and policy requirements.

The MGIH Review Guide has established three criteria for assessing the effectiveness of the information planning function:

1.   The information requirements for operational, legislative and policy purposes are identified and analysed.
2.   Information management plans are coordinated with the support requirements for corporate and operational information holdings.

3.   Opportunities for information technology applications are assessed in relation to information holdings requirements.

2.3   Collection, Creation and Receipt

The objectives for this component are that the institution collects, creates and receives only the information that is necessary to meet its operational, legislative and policy requirements and avoids collecting, creating and receiving information that is already available in order to minimize cost and response burden.

The MGIH Review Guide has established five criteria for assessing the effectiveness of the collection, creation and receipt function:

1.   The information collected or generated meets the identified needs.
2.   Information collection is coordinated and meets with applicable requirements.
3.   The costs of collecting, creating and receiving information are minimized.
4.   Response burden is minimized in the collection of information.
5.   Forms meet all statutory and policy requirements.

2.4   Organization, Transmission, Use and Retrieval

The objectives for this component are that information is organized to make the widest possible use of it and that systems for information transmission, use and retrieval respond efficiently and effectively to the needs of users.

The MGIH Review Guide has established four criteria for assessing the effectiveness of the organization, transmission, use and retrieval function:

1.   Information is organized to make the widest possible use of it.
2.   Information is identified and described in a manner that is meaningful to users.
3.   Levels of service – in terms of getting information to users – are identified and meet operational needs and user requirements.
4.   Responsiveness to users is balanced against cost-effectiveness.

2.5   Storage, Protection and Retention

The objectives for this component are that the institution maintains information while it has operational value in terms of supporting decision making, program operations and service delivery and while it is required to meet legislative and policy requirements and that information that serves to reconstruct the evolution of policy and program decisions is retained.

The MGIH Review Guide has established four criteria for assessing the effectiveness of the storage, protection and retention function:

1. The institution has identified and is protecting and retaining information on its projects, programs, and policies to ensure continuity in the management of the organization.
2. Storage and protection methods balance operational, legal and user requirements.
3. Information storage, protection and retention methods and costs are justified.
4. The institution has a systematic process to ensure that information of enduring value which documents the evolution of the institution's policies, programs and major decisions is identified and retained.

2.6   Disposition through Transfer or Destruction

The objective for this component is that information is disposed of through destruction or by transfer to the control of the National Archives, or to organizations outside the control of the Government of Canada, in accordance with the requirements of the *National Archives of Canada Act*.

The MGIH Review Guide has established two criteria for assessing the effectiveness of the records disposition function:

1. All information which are records (i.e., except published material) are scheduled for retention and disposal. [Note that for continuity purposes questions related to retention scheduling are included in section 2.5.]
2. The disposal of records occurs in accordance with the requirements of subsections 5(1), 6(1) and 6(3) of the *National Archives of Canada Act*.

Appendix B – Interviewees

	Interviewee	Title
1	Susan Abuid	Information Officer, IRAD
2	Kevin Campbell	Technical Specialist, Security, IM
3	Gaetan Caron	Chief Operating Officer
4	Wendy Ettinger	Technical HR Advisor, Corporate Services
5	Byron Goodall	Business Leader, Information Management
6	Susan Gudgeon	Senior Para-legal, Legal Services
7	Sandy Harrison	Business Leader, Applications
8	Rudi Klaubert	Regulatory Information Administrator, Operations
9	Brian Labbé	Team Leader, Supply Management
10	Michel Mantha	Secretary to the Board
11	John McCarthy	Business Leader, Operations
12	John McIsaac	Team Leader, IRAD
13	Claire McKinnon	Counsel, Legal Services
14	Bob Modray	Technical Specialist, Economics & Energy Analysis, Electricity Team, Commodities
15	James Obrigewitch	Systems Project Manager, Business Application Development & Support
16	Fern Phillips	Records Administrator, IRAD
17	Howard Plato	Team Leader, IT Operations
18	Peter Schnell	Team Leader, Planning & Reporting
19	Brian Towers	RDIMS Application Manager Shared Systems Support Centre
20	Ken Vollman	Chairman and Chief Executive Officer
21	Chris von Egmond	Team Leader, Operations Compliance
22	David Walker	Market Analyst, Commodities
23	Doug Whyte	Archivist, Government Records National Archives of Canada
24	Louise Lacasse & France Millette & Mary Lou Scharf	Office of the Secretary to the Board
25	Focus Group	IRAD staff
26	Focus Group	Applications and Operations staff

Appendix C – Documents Reviewed

1.0   National Energy Board

- Access to Information and Privacy. Processes and Guidelines
- Annual Report 2001
- Document Handling at the National Energy Board – Revised Version (October 2002)
- E-filing Repository Administration Guide (August 2002)
- Filers Guide to Electronic Submission (May 2002)
- Human Resources. F-Drive [business rules]
- Information Management Business Unit. *Information Management Vision and Strategy Initiative* (1998)
- An InfoRM Overview
- INFOrmation Resources Management Phase 1. Project Definition. Vision.
- Information Systems Methodology. Version 2.0 (September 2002).
- Internet site
- Job Description: Team Leader, Information Resources and Distribution (July 2001)
- Knowledge Management Renewal Program. Planning Project Charter (Draft – October 2002)
- Knowledge Management Renewal. Presentation to ITAC (October 2002)
- Organization Chart (September 2002)
- Records Management Policy and Procedures Manual
- Records Classification Schedule (Primary numbers and descriptors)
- Records Management Services. User Guide (July 1993)
- Request for Proposal: Information Management Vision and Strategy (March 1998)
- Review of Issues and Procedures for Handling of Documents Subject to an Order under Section 16.1 of the *National Energy Board Act*.
- RCMP. Standard for the Transport of Sensitive Information and Assets (March 1995)
- Safety and Environmental Management System ISO 14001 & OHSAS Gap Analysis [extract] (March 2002)
- Tips for Effective E-mail Use.

2.0   Legislation and Central Agency Policy

- *Access to Information Act*
- Access to Information Policy
- *Canada Oil and Gas Operations Act*
- Communications Policy of the Government of Canada
- *Emergency Preparedness Act*
- Management of Government Information (MGI) Policy – Draft. (See: http://www.cio-dpi.gc.ca/ip-pi/pols/drftmgi-ebchegig/drftmgi-ebchegigpr_e.asp?format+pri)

- Management of Government Information Holdings Policy

- Management of Information Technology Policy

- *National Archives of Canada Act*

- *National Energy Board Act*

- *Personal Information Protection and Electronic Documents Act*

- *Privacy Act*

- Privacy and Data Protection Policy

- Government Security Policy.

3.0   Information Management

- *Access to Information: Making it Work for Canadians*. Report of the Access to Information Review Task Force. June 2002.

- Chapter 2: "Resuscitating Information Management", *Annual Report of the Information Commissioner*, 2000-2001.

- "The Cabinet Papers System", Part E – Supplementary Information. *Memoranda to Cabinet – A Drafter's Guide*. June 2000.

  See: http://www.pco-cp.gc.ca/default.asp?Language=E&Page=publications&doc=mc/e_e.htm

- Case for Action for an Information Management Strategy for the Government of Canada. April 2002. See: http://www.archives.ca/06/docs/action_e.pdf

- E-mail Management in the Government of Canada. November 2002. See: http://www.archives.ca/06/060404_e.html

- Framework for the Management of Information in the Government of Canada (FMI). See: http://www.cio-dpi.gc.ca/im-gi/fmi-cgi/fmi-cgi_e.asp

- Guide to the Review of the Management of Government Information Holdings. Exposure Draft. January 1994.

- Health Canada. Audit of Records Controls. Preliminary Review Report. September 1998.

- Information Management Capacity Check Tool (formerly know as the IM Maturity Model) August 2002. See: http://www.archives.ca/06/docs/immmt_e.pdf

- ISO 15489. International Standard. Information and documentation – Records management. 2001.

- Privy Council Office. A User's Guide to Records Keeping at PCO. July 2000.

- Protecting Essential Records. A short guide for government institutions. April 2001. See: http://www.imforumgi.gc.ca/new_docs/erguide_e.pdf

- RDIMS Implementation at Transport Canada: Case Study. Special Briefing to the RDIMS Board of Directors. January 29, 2003.

- Results for Canadians: A Management Framework for the Government of Canada. http://www.tbs-sct.gc.ca/res_can/dwnld/rc_e_pdf.pdf

**Appendix D – Guide to the Federal
Government's Legislative and Policy
Framework for Information Management**[13]

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[13] Revised

1.0   Overview

Since passage of the *Official Secrets Act* in 1952, statutory and policy requirements governing the administration and management of government records has increased steadily. In the early 1960's Statistics Canada received the authority to improve information collection and reduce the response-burden placed on the public. The Public Records Order (1966) expressed the government's intention to inventory, organize and control government records. Since then, legislation such as the *Access to Information Act*, the *Privacy Act*, the *National Library Act*, the *National Archives of Canada Act* and Treasury Board policies, including the Management of Government Information Holdings policy, Government Security policy, Communications policy, and the Management of Information Technology policy have been issued, influencing the way information is administered and managed, and demonstrating the recognition of its value to both the government and the public.

In 1999, the Chief Information Officer Branch (CIOB) of the Treasury Board Secretariat (TBS) recognized that information management was becoming an issue across government. The Government On-line (GOL) initiative required that the ongoing quality and integrity of the government's information infrastructure would have to be addressed. Members of the Advisory Committee on Information Management (ACIM) expressed concern about their capacity to address emerging IM issues within their departments and agencies (e.g., data and information standards to enable information access, retrieval, and sharing; preservation standards, etc.) and about the availability of policies, systems, standards, best practices and people to address the emerging electronic environment. Dr. J. English's *Report on the Future Roles of the National Archives and the National Library* suggested that the two institutions should assume a more active leadership role in developing an information management infrastructure for the government. Finally, the 1999 *Annual Report of the Information Commissioner* commented on the poor state of records management which, in the opinion of the Commissioner, was contributing to the inability of the government to fully meet its access to information obligations.

The government responded to the situation by commissioning John McDonald's report: *Information Management in the Government of Canada: A Situation Analysis* (April 2000) which made a series of recommendations towards supporting the GOL initiative, enhancing the policy framework, tools and training for records management, and building a sustainable IM infrastructure. An IM division was created in the TBS in 2000 with an ambitious action plan to deliver on those recommendations. A revised Management of Government Information Policy (MGI) was drafted that same year. It is in the final stages of approval. The *Framework for the Management of Information in the Government of Canada* (FMI) was released in 2001 and is gradually being populated with the necessary standards, guidelines and on-line guides. The National Archives (NA) developed A Case for Action in 2002 which proposes that a strategy be developed to improve the government's information management infrastructure. The NA has released the IM Capacity Check Tool which department's can use to self-assess the state of IM in their organizations and are in the process of developing a *Records and Information Life Cycle Management Guide*, an on-line resource centre, and a guide to the development of function- or business-activity based classification structures.

In 2000, the *Personal Information Protection and Electronic Documents Act* provided for the use of electronic alternatives by government institutions to create, collect, receive, store, transfer, distribute, publish and otherwise deal with documents or information whenever a federal law does not specify the manner of doing so. Finally, in response to recent events, the Government Security Policy was revised in 2002.

Institutions are required to assess and define their information and record keeping needs. This includes: identification of information content requirements; control of the creation and use of forms; elimination of unnecessary record collections; maintenance and protection of information and records collected or generated; and adherence to legal, policy, and contractual requirements and constraints. All government information holdings must be identified and described in the appropriate public reference sources, and retention and disposition schedules must be developed for these records and approved by the National Archives.

Federal legislation and Treasury Board policies and strategies have a significant impact on the administration and management of each of the record life cycle stages. As a guide for departmental management, brief summaries or highlights of the main record laws and polices follow. Of course, only the complete, original instruments should be used or cited as authoritative sources.

2.0   Legislation

2.1   *Access to Information Act* (1983)
In accordance with the principle that government information should be made available to the public, the *Access to Information Act* provides the public with the "right to access" government records. Subject to specific and limited exemptions, a person who requests access to government information shall be given an opportunity to examine the records or be provided with a copy of that information. An Information Commissioner is appointed by the Governor-in Council to ensure that decisions on the disclosure of information are reviewed independently of the government.

The Act requires the issuance of an annual publication which includes a description of the organization, its responsibilities and a description of all classes of records in sufficient detail to facilitate the exercise of the right of access. This publication, entitled *Info Source*, is a series of updated publications and databases intended to make it easy to find information held by the federal government.

Six Main Sections
General principles. This section deals with the purpose of the Act, pertinent definitions, and its scope. It is to be used as a last resort, not a replacement to existing regular or informal channels.

Right of access. Deals with the rights that are granted under the Act, to whom they apply and how the procedures for gaining access to information operate. It also deals with the issue of costs associated with gaining access to the information requested.

Exemptions and exclusions to the legislation. Describes the limited and specific instances under which a person's rights of access do not apply.

Complaint and review mechanisms. Describes a review process that is independent of government departments and agencies. It is a two-tiered process which permits an individual to complain first to the Information Commissioner and then to request a review by the Federal Court.

Offenses. Deals with obstructing the right of access. Section 67.1, added to the Act in 1999, says that no person shall, with intent to deny a right of access under this Act, destroy, alter, falsify or conceal a record or counsel any person to do any of these action and provides for penalties of up to 2 years imprisonment and/or a fine of up to $10,000.

Other general provisions. Describes the delegation of authority and staff liability under the Act and describes applicable controls.

Policy Support

The Act is supported by an explicit Access to Information policy, in addition to the Management of Government Information Holdings policy described below.

2.2   *Privacy Act* (1983)

The *Privacy Act* protects the confidentiality of information about an identifiable individual held by a government institution. The Act requires that personal information be collected directly from the individual to whom it relates. The individual must be made aware of the purpose of the collection and the information may not be used for any other purpose that the one for which it was originally collected without the approval of the individual, except as specified in the Act. Personal information must be protected and indexed as a registered Personal Information Bank (PIB). The individual to whom the information relates has the right to access the information upon request.

Info Source, which identifies the content and location of Personal Information Banks, is published annually. All requests for access to personal information are directed through the departmental Privacy Coordinator.

Six Main Sections

General principles. This section deals with the purposes of the Act, pertinent definitions, and its scope.

Right of access. Deals with the rights that are granted under the Act, to whom they apply and how the procedures for gaining access to one's personal information operate.

Use and disclosure of personal information. Specifies the circumstances under which the government may use or disclose personal information.

> Code of Fair Information Practices
> Data Matching
> Use of the Social Security Number

Exclusions and exemptions to the legislation. Describes the limited and specific instances under which a person's rights of access do not apply.

Complaint and review mechanisms. Describes a review process that is independent of government departments and agencies. It is a two-tiered process which permits an individual to complain first to the Privacy Commissioner and then to request a review by the Federal Court.

Other general provisions. Describes the delegation of authority and staff liability under the Act, and describes the controls placed on the collection and maintenance of government information holdings.

Policy Support
The Act is supported by an explicit Privacy and Data Protection policy, in addition to the Management of Government Information Holdings policy described below.

2.3   *National Archives of Canada Act* (1987)
The *National Archives of Canada Act* received assent in the House of Commons on March 25, 1987, resulting in the establishment of the National Archives of Canada, previously the Public Archives of Canada. The National Archivist, among other functions, provides advice to government institutions concerning the standards and procedures pertaining to the management of government records.

The National Archives of Canada works "to conserve private and public records of national significance." The management of records throughout their life cycles includes the establishment of retention and disposition schedules. Government institutions must seek the approval of the National Archivist prior to disposing of any government information, including records. These retention and disposition schedules are developed in conjunction with responsibility centre managers and must be approved by the National Archivist.

2.4   *Emergency Preparedness Act* (1988)
The *Emergency Preparedness Act* governs national emergency preparation requirements. The purpose of the Act is to advance civil preparedness in Canada for emergencies of all types, including for example, flood, earthquake, war and other armed conflict, be facilitating and coordinating, among government institutions, and in cooperation with provincial governments,

foreign governments and international organizations, the development and implementation of civil emergency plans.

In this context, an Essential Records program is required by law for federal institutions and begins with managers deciding what information is essential to running the organization. Essential records must be stored, by law, in facilities that are dry, temperature-controlled and dust free. These sites must also have controlled access separate from the site where the records were created or used regularly.

2.5   *Personal Information Protection and Electronic Documents Act* **(2000)**

The *Personal Information Protection and Electronic Documents Act* creates an electronic alternative for doing business with the federal government and clarifies how the courts should assess the reliability of electronic records as evidence. It also includes key measures to protect personal information collected by the private sector.

2.6   *Financial Administration Act*

The *Financial Administration Act* requires that financial records be kept for six fiscal years after the last administrative decision has been made.

2.7   *Canada Evidence Act*

The *Canada Evidence Act* sets out the rules for acceptability of information to the Courts and the authenticity of any signature related to the information. In addition, the Canadian General Standards Board has issued national standards (*Microfilm and Electronic Images as Documentary Evidence*) on how to establish an image management program.

3.0   Policies

3.1   Management of Government Information Holdings Policy (1989)

The Treasury Board's 1989 policy, Management of Government Information Holdings (MGIH), was a response to the *Access to Information Act*'s requirement that government department's publications and other recorded information be inventoried and made accessible internally and to the public at large. The policy objective is "to ensure the cost-effective and coordinated management of federal government information holdings."

It is the policy of the government to:

- Manage all information holdings as a corporate resource to support effective decision-making, meet operational requirements and protect the legal, financial and other interests of the government and the public;
- Make the widest possible use of information within the government by ensuring that it is organized to facilitate access by those who require it, subject to legal and policy constraints;

- Reduce response burden on the public by eliminating unnecessary collection of information; and
- Identify and conserve information holdings that serve to reconstruct the evolution of policy and program decisions or have historical or archival importance and to ensure that such information is organized in a manner to be readily available for the study of decision-making in government and other educational purposes which explain the historical role of the federal government in Canadian society.

Policy requirements of the MGIH are directed at:

- Corporate management;
- Assessing and defining information needs;
- Records collection;
- Maintenance and protection of records;
- Dissemination and use of records; and
- Preservation, retention and disposal of records.

One purpose of the MGIH was to combine in one holistic policy a variety of previously existing policies dealing with the various media (paper, microfilm, electronic, etc.) by recognizing information content or meaning as an integrating force or common denominator. In relation to the previous policies, the MGIH brought only two new policy requirements: designating a senior official to represent the deputy head to Treasury Board Secretariat and other central agencies for the purposes of the MGIH, and the establishment of a departmental "inventory" of information holdings.

In 2000 a revised Management of Government Information policy (MGI) was drafted. This policy is in the final stages of approval. The MGI policy direction focuses on a cost-effective governance and accountability structure, information in all media and formats, access in a manner that promotes public trust and the sharing of information, the shared responsibility of all managers and staff for information management and on the "duty to document" the decision-making process. The MGI incorporates the principles of Modern Comptrollership into information management.

3.2   Management of Information Technology Policy (1990)

Treasury Board saw a complimentary relationship between information holdings and information technology, which together define the federal government's position on "information management."

The objective of the Management of Information Technology policy is to ensure that information technology is used as a strategic tool to support government priorities and program delivery, to increase productivity, and to enhance service to the public.

It is the policy of the government to:

- Use information technology in renewing the way government does its business, and to maintain a technologically adept and modern public service;
- Coordinate and set overall directions for government information technology; and
- Use a business-case approach to develop information technology strategies based on program priorities, and to select and approve government information technology investments that best meet the policy objective and show due regard for employees and members of the public.

Utilized efficiently and effectively, technology can improve the collection, processing, accessibility and storage of information, i.e., administration of the information life cycle.

3.3 Government Security Policy (2002)

The Government Security Policy identifies the criteria for the classification or designation of information within the federal government.

Institutions are required to identify information when its unauthorized disclosure, with reference to specific provisions of the *Access to Information Act and the Privacy Act*, could reasonably be expected to cause injury to:

- The national interest. Such information is classified. It must be categorized and marked based on the degree of potential injury (injury: "Confidential"; serious injury: "Secret"; exceptionally grave injury: "Top Secret".
- Private and other non-national interests. Such information is protected. It must be categorized and marked based on the degree of potential injury (low: "Protected A"; medium: "Protected B"; high: "Protected C").

In addition, under the Government Security Policy, each government institution must establish a security program that includes provisions to protect information assets in the sharing of information, contracting and information technology systems and for business continuity purposes.

3.4 Communications Policy of the Government of Canada (2002)

The Communications Policy was instituted to ensure that communications across the Government of Canada are well co-coordinated, effectively managed and responsive to the diverse information needs of the public. The policy requires government institutions to provide the public with open access to information about policies, programs, services and initiatives.

Systems for the use and retrieval of records must be capable of serving communications objectives such as responding promptly without undue recourse to the *Access to Information Act*.

Appendix E – Model Information Management (IM) /

Records Management (RM)

Roles and Responsibilities Matrix

Requirements	Senior Managers	CIO (or IM/RM Function OPI)	RC Managers	Employees/Contractors
DEPARTMENTAL MANAGEMENT:				
Policy and planning	• Approve IM plans • Accountable for implementation and compliance with IM/RM policy • DM accountable for ensuring corporate management of records • ADM, responsible for IM/RM Function, represents government institution in Management of Government Information Holdings policy to Treasury Board • CIO, or equivalent, accountable for departmental coordination of IM/IT planning • Head, Internal Audit responsible for periodic audits of IM/RM policy	• Ensure coordination of IM/RM policy with other departmental policies • Monitor IM/RM policy • Develop corporate IM/RM plans • Coordinate and facilitate IM/RM planning process • Identify, integrate and implement related technology solutions	• Ensure adherence with IM/RM policy • Identify IM/RM needs in IM planning process • Communicate IM/RM needs for integration with branch IM plans • Implement IM/RM plans • Report on and provide feedback to Senior Managers and CIO (or equivalent) on IM/RM plans • Ensure that business-driven technology solutions are integrated with departmental standards, systems and tools	• Apply IM/RM policy • Apply IM/RM plans • Provide feedback to RC Manager on application of IM/RM policy and plans
Standards, procedures, guidelines, advice and guidance	• Accountable for implementation and compliance with IM/RM standards and procedures	• Develop and maintain an effective IM/RM infrastructure • Provide advice and guidance • Monitor effectiveness and efficiency of IM/RM standards, procedures and guidelines • Ensure linkages to professional community documentation standards adopted by the department	• Ensure adherence with IM/RM standards and procedures • Inform CIO (or equivalent) of professional documentation standards in their areas • Identify IM/RM training needs • Implement IM/RM standards and procedures • Report on and provide feedback to Senior Managers and CIO (or equivalent) on I/RM standards and procedures	• Apply IM/RM standards and procedures • Understand concepts and benefits of IM/RM and seek training and advice when needed • Recognize cost and relative worth of information and manage information as a corporate asset
INFORMATION MANAGEMENT PRACTICES:				
Creation, collection, receipt			• Identify operational and/or administrative information requirements and guide employees in establishing or adopting a framework for recordkeeping based on business needs	• Create, collect and receive appropriate records, as needed and relevant to business

Requirements	Senior Managers	CIO (or IM/RM Function OPI)	RC Managers	Employees/Contractors
Organization, transmission, use and retrieval	• Approve organization and classification structures (including metadata) • Accountable for implementation of organization and classification structures • Accountable for ensuring the completeness and integrity of the corporate records inventory	• Develop and maintain departmental organization and classification structures (including metadata), and provide advice and guidance and assistance in application of classification structures • Promulgate organization and classification structures to RC managers • Monitor the integrity and completeness of the corporate records inventory	• Provide feedback to CIO (or equivalent) on application of classification and organization structures (including metadata) • Ensure records are properly identified and organized to minimize cost of retrieval and ensure ability to meet legislated requirements (i.e., easily accessible for Access to Information and Privacy legislation)	• Identify departmental records • Apply organization and classification structures (including metadata) to departmental records and information (i.e., web-based information) • Provide feedback to RC Manager on new or changing needs • Contribute to corporate records inventory
Storage, protection and retention	• Accountable for adherence to departmental and government-wide security requirements	• Develop guidelines for safeguarding recorded information in accordance with government-wide security requirements • Offer facilities to store and maintain records (could be based on service agreements with internal clients) • Monitor the effectiveness of safeguards	• Identify appropriate medium for the storage and protection of recorded information • Ensure that safeguards are in place for the protection of records and information (i.e., copies of records on departmental web sites) used in program delivery	• Apply departmental guidelines for safeguarding and protecting recorded information
Disposition	• Accountable for proper application of records retention schedules and disposition actions • Approve records retention schedules and disposition	• Develop departmental multi-year disposition plan • Coordinate and monitor the records scheduling process • Facilitate records disposition process • Transfer historical records to National Archives in consultation with RC Managers	• Identify records retention schedule requirements • Coordinate approval process of records schedules and disposition requests	• Apply records retention schedules in consultation with CIO (or equivalent) and RC Managers • Inform RC Managers of records retention schedule requirements

Appendix F – Process Maps

Commodities Project Process Map: Energy Market Assessments

Inputs	Process	Outputs

Project Initiation
- Input: NEB Plans & Priorities, Business Plan, etc.
- Outputs: Draft Project Plan; Draft Communications Plan

Project approval
- Outputs: MMM minute; Final Project Plan; Final Communications Plan

Information Gathering
- Inputs: Consultation with general public, Industry, public interest groups and other stakeholders; Data from internal and external sources (e.g. StatsCan and industry)
- Outputs: Consultation notes, correspondence; Data reports

Analysis
- Output: Analytical assessments, status reports, internal presentations

Preliminary Report(s)
- Output: Internal report drafts

Final Report
- Output: Board minute, publication, web document

National Energy Board Pre-Hearing Process Map*

* Note that this map is intended to describe the general hearing process and is not intended to define the specific sequence of steps to be taken. Only key records outputs are shown.

Inputs	Process	Outputs
Application	Application Registered	Application
		Notice of Receipt?
?	Preliminary Analysis	?
	Select Project Manager	First News Release
	Designate Hearing Panel	Board Minute
	Select Project Working Group	
?	Analysis	Reports (?)
	Pre-Hearing Session	Proceedings (?)
	Decision on Process	Hearing Order?
Direct Evidence		Second News Release
		Information Requests
		Hearing Questions
Information Input	Review Response	Information Request
	Amendments to Decision Process	Amendments
	Parties Listed	List
		Subpoena
	Pre-Hearing Conference	Proceedings
		Third News Release

Key

Action step which is part of hearing process

Action which may occur in different sequence to that shown or is an optional step.

Action which may occur on several occasions during pre-hearing and hearing steps.