

## Rohm and Haas strengthens compliance with electronic records management initiative.

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### Overview

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#### ■ Challenge

Streamline regulatory and legal compliance processes while improving business efficiency and effectiveness

#### ■ Why IBM?

IBM and its business partner, Integro, provide an end-to-end solution that effectively separates and isolates essential e-mail from nonessential e-mail with minimal disruption to employees

#### ■ Solution

An electronic content management solution that simplifies the capture and retention of essential e-mail while helping employees leverage the value of business information throughout its lifecycle

#### ■ Key Benefits

Strengthens governance processes; improves staff efficiency; protects corporate intellectual property; enhances collaboration to drive greater innovation



Rohm and Haas demonstrates that separating and isolating business records from nonessential e-mail need not be an onerous task.

From the Sarbanes-Oxley Act (SOX) to new U.S. Federal Rules of Civil Procedure, companies face a growing number of regulations regarding the control and retention of business records. Yet, with the explosive growth of e-mail and other electronic documents, companies are finding the time and cost of maintaining information for governance rapidly increasing.

It's an issue that Rohm and Haas, a global pioneer in the creation and development of specialty materials, is tackling head on. With diversified offerings across many industries, Rohm and Haas is faced with observing thousands of legal and regulatory mandates. As a result, executives

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*– Sandy Hostetter, Program Manager, Electronic Content Management and Retention, Rohm and Haas*

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want to ensure that the company's records management processes are as effective and efficient as possible. Inefficiencies in collecting, storing and retrieving information for compliance and governance have the potential to dramatically impact staff productivity and substantially increase costs.

A key area of concern is the daily management and separation and isolation of the tens of thousands of e-mail records from non-essential e-mail in the company's IBM Lotus® Notes® and Domino® messaging system. Operational information, such as customer negotiations, contracts, product development and manufacturing data are commonly communicated via e-mail. However, the company had no way to separate and isolate these important business records from transitory information. During legal discovery, Rohm and Haas staff often had to pore through volumes of unrelated information to find supporting documentation.

As a first attempt to restrict the amount of e-mail employees keep, the IT department implemented space quotas, causing employees to proactively sort and discard unnecessary e-mail to stay within their limits. However, many employees simply archived old e-mail on their laptop and desktop PCs. This made it difficult for company representatives to locate information during legal discovery or audits.

“During discovery, our Law Department was forced to sort through a lot of irrelevant information and this ultimately drives costs up,” says Sandy Hostetter, Program Manager for Electronic Content Management and Retention at Rohm and Haas. “We have to make sure that we keep the appropriate information for the appropriate period of time and that records are accessible and trustworthy when needed.”

### **Simplifying e-records management**

Rohm and Haas launched the Electronic Content Management and Retention (ECMR) program to create policy standards and best practices for the way it organizes and manages electronic information to meet its business, legal and regulatory record-keeping requirements. The program, jointly sponsored by the company's CIO and General Counsel, will ensure that Rohm and Haas has:

- *Appropriate records to meet its business and regulatory requirements.*
- *Assigned accountability for the management of electronic records with an assigned responsibility for disposition.*
- *Properly categorized records at all stages of the information life cycle.*

Rohm and Haas sought a “structurally sound and business-flexible solution” that would satisfy stringent legal and regulatory requirements without interrupting business processes and also mesh with existing IT infrastructure.

“Rohm and Haas wanted to make sure that it was compliant with all the regulatory, legal and other requirements for the control and appropriate preservation of the company’s ever proliferating electronic records,” said Dennis Wilson, Assistant General Counsel and Chief Litigation Counsel, Rohm and Haas. “This program enabled us to enhance our policies and practices for the efficient and cost-effective management of our electronic data.”

As a first step, Rohm and Haas created and issued a corporate Electronic Records Management (ERM) policy and instituted annual e-cleanouts to begin to raise employee awareness. Then, in partnership with the Huron Consulting Group (Huron), the company created an Electronic Content Management and Retention Standard that outlined the orderly progression from the ERM Policy to the practical implementation of appropriate record-keeping within any company information system. Huron also helped identify the applicable regulations at state, federal and international levels and develop appropriate retention schedules based on these requirements.

Next, Rohm and Haas focused on understanding the e-mail habits and work requirements of employees. To address the needs expressed by end users, the ECMR team developed a three-zone e-mail management approach and engaged IBM business partner Integro to develop prototype-supporting technology. Integro is an enterprise content management consultancy that designs and implements solutions on the IBM platform.

The team conducted multiple technical proof-of-concepts using a group of employees who allowed their production e-mail databases to be mapped to a development server environment configured with the prototype software. This step validated that the approach would meet IT infrastructure requirements as well as records management and user needs.

Rohm and Haas released an RFP to major vendors that offer appropriate technologies. After a rigorous selection process, Rohm and Haas selected IBM and IBM Business Partner Integro, whose combined solution scored the highest in meeting the ECMR Standards specifications.

### **Managing records according to business value**

Instead of retaining and storing every e-mail that comes and goes through the mail system, the solution allows Rohm and Haas employees to manage each e-mail with the appropriate level of control based on the e-mail’s business value. Transitory e-mail is routinely disposed of in the normal course of business. E-mail needed for business and compliance requirements can be easily identified, retained and located by staff in secure, trustworthy storage.

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## **Key Components**

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### *Software*

- IBM Content Manager
- IBM CommonStore
- IBM Records Manager
- IBM Lotus Notes and Domino
- Integro Email Manager

### *IBM Business Partner*

- Integro, Inc.
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With Integro Email Manager, employees divide their e-mail into three groups or zones. All e-mail defaults to an Auto-Delete Zone where transitory e-mail is deleted after a specified period of time, usually 60 days. Employees can quickly and easily protect important e-mail from automatic deletion by assigning it to their personal Work Space Zone. E-mail in the Work Space Zone is controlled by a size limit. While no time restriction is currently applied to e-mail kept in this zone, when the size limit is exceeded, employees are no longer able to send any new e-mail until they delete or reassign messages so that they again fall within their limit.

Also, employees can classify e-mail with business value (as identified on the company records retention schedule) as a Company Record by assigning it to the appropriate record retention schedule category. IBM CommonStore securely and efficiently moves the categorized e-mail, now the official copy, from the e-mail system into IBM Content Manager, which acts as a central Electronic Records Center (ERC). To ensure unencumbered access for the end user, a full informational copy of the Company Record is left in the Work Space Zone for 90 days, at which point it turns into a partial copy with a link to the official copy in the ERC.

In the solution, Integro Email Manager software is integrated with IBM Records Manager to retain and control the e-mail and its attachments. The official copy of the e-mail is locked as a record to preserve integrity and is automatically maintained in accordance with corporate retention requirements. Legal holds can be applied to all stored e-mail when necessary to prevent records from being auto-deleted or purged at the end of their business lifecycle, if the records have been identified as potentially responsive in litigation, regulatory investigation or other legal proceeding.

“The unique zone approach supported by IBM and Integro allows us to manage e-mail according to its business value in a way that is least disruptive to our users,” explains Hostetter. “We offer employees two easy options for selecting and storing e-mails with business value: they can individually designate e-mail messages, or they can pre-assign a designated folder and drag e-mail messages into it.”

#### **Cost-effectively managing information throughout its lifecycle**

The “Managed Email” approach, which is now being rolled out to more than 6,000 Rohm and Haas employees in North America and will eventually roll out to all 16,000 employees worldwide, is designed to improve staff efficiency and make the legal discovery process in e-mail faster and more accurate.

"Managing electronically stored information is a significant challenge," says Hostetter. "Implementing our Managed Email approach is a very solid first step on our journey to streamlining our search and retrieval processes for discovery and audits. Over time we expect this to dramatically reduce the time and cost of compliance processes."

Additionally, eliminating the need to store the hundreds of thousands of nonessential e-mail messages sent every day will help the company improve e-mail system performance; reduce backup and restore times; contain costs for information migration due to media, software and hardware obsolescence; and lower overall storage costs.

Regardless of the cost savings the company expects to realize, Hostetter emphasizes that a comprehensive electronic records strategy is a must for any company. "It's the right thing for companies to do," explains Hostetter. "It demonstrates good corporate citizenry and due diligence in information management to customers and shareholders."

## **Leveraging information for innovation and insight**

Hostetter anticipates that as employees use the company's Managed Email system new opportunities will emerge, especially in the area of collaborative record-keeping. For example, one district sales manager plans to use the content repository to more effectively share product and pricing information among his sales teams. He expects this will help drive new levels of efficiency and strengthen customer service.

"The more disciplined approach to information management that these tools support will allow us to leverage information in new ways," explains Hostetter.

### **For more information**

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