ELIMINATE

CONTENT CHAOS

Streamlining workflow and proactively managing content solves compliance challenges and saves more than $200,000 for this financial services provider.

by Vicki Amendola

Money. Everybody wants it. Some get it by luck, some by inheritance, but the majority of us spend our lives working hard to get it. And now, more than ever, this uncertain economy forces us to think hard about the choices we make concerning the management of our money. First Command Financial Services understands the importance of these choices. As an investment advisor firm registered with the U.S. Securities and Exchange Commission, First Command also remains acutely aware of the highly regulated nature of the financial services and securities industry.

Originally founded in 1958 to support America's professional military families in their efforts to reduce debt, build wealth, and pursue the omnipresent American dream, First Command now serves more than 300,000 client families from all walks of life to the tune of $17 billion in managed assets. On top of that, First Command also operates a banking subsidiary, First Command Bank. The obvious story is that a financial operation of this size would create mega-mountains of paperwork, and a solid content management solution would be needed to eliminate inefficient, manual paper-based processes. However, a recent conversation with Chris Campbell, Documentum architect at First Command, revealed that gaining efficiency wasn't the company's only concern — nor was it the top concern. First Command was in search of an enterprise solution that would not only remove the built-in inefficiencies of paper-based processes, but also serve as a foolproof method of ensuring that all of these processes remained in compliance with federal regulations for everything from document processing and retention to electronic signatures and e-Discovery.

WHY WORKFLOW?

Corporate leadership at First Command had recognized the need to simplify many of the processes involving the myriad content crossing people's desks every day even before this most recent economic downturn. Virtually everything that appears in print or is otherwise disseminated to the public or out to First Command field agents — from company announcements and marketing materials to policy and procedure updates — has to be approved by a varied list of individuals and departments prior to release. According to Campbell, the company has more than 200 such items each month encompassing more than 30 different document types and navigating through as many as 16 separate departments. Without a formal structure in place to outline the approval workflow of each document type, items were circulated through the company in a seemingly haphazard fashion.

The majority of departments at First Command used a combination of documents and printed form templates to be filled out by hand and then personally walked from individual to individual gathering approval signatures. It wasn't uncommon for items to get routed two or three separate times due to the lack of clarity surrounding who needed to sign what, how many signatures were needed, and so on. If people were not in their office when someone came for an approval signature, the documents in question could be left on a desk and subsequently were often buried or lost.

Furthermore, because items were being passed through all departments the approval process stalled in departments, with no vested interest in the document in question, such as a new piece of marketing material being shuffled to the bottom of the priority list once it hits the human resources department that is currently concentrating on revisions to recruiting documents. "Frustration over how long it would take to get a simple document approved made it a temptation to cut corners," says Campbell.

At First Command, these workflow processes — or a lack thereof — contributed to an often chaotic content environment. Behind these process inconsistencies, however, a deeper concern lurked. "Having people walk papers all over the building to obtain

Chris Campbell, Documentum architect, built a content management solution from the ground up to eliminate chaotic workflow and compliance concerns at First Command Financial Services.

> *"All it takes is one angry investor. ... The burden of proof falls on the provider to comply with e-Discovery requests."*

Chris Campbell, Documentum architect, First Command Financial Services

signatures had become untenable," says Campbell. "It was too slow, and things were getting lost because we had no way of tracking the location of documents." Any tracking, if it was done at all, was managed individually on a spreadsheet. This lack of accountability and tracking exposed First Command to compliance risk and liability. In fact, one of the biggest drivers going into the project was the legal/compliance aspect.

KNOW YOUR COMPLIANCE CONCERNS

The financial services industry is without a doubt highly regulated. That doesn't mean, however, that it is clearly regulated. If you take a look at some of the most common regulations in the industry such as Sarbanes-Oxley, Gramm Leach Bliley, and even the Patriot Act, all address the need to 'safeguard your data/client data.' These mandated rules and regulations don't come with instruction manuals, so to speak. "Most of these industry regulations are very vague and nebulous," says Campbell. "They require you to follow best practices to safeguard data without necessarily identifying what those specific best practices are."

A good example of this is the SEC (Securities and Exchange Commission) 17a-4, a regulation that requires a financial organization to keep a record of everything it says publicly, whether in print, electronic communication, or even on the Web. "Because people are investing based on our advice, we have to be sure we are representing ourselves properly," says Campbell. A case in point that Campbell references is the advertised interest rate, a piece of data that changes quite frequently, sometimes almost daily. "What if that interest rate changes? We've got to be right on top of that so we are not advertising a different rate than it actually is," says Campbell. "There's little gotchas and simple things you tend not to think about. As we move further and further into the real-time data world, it becomes more and more important."

But, much like in our own attics, Campbell says the questions always come into play concerning how long to keep "things." "What are we really responsible for? And what about our independent agents – how do we protect them?" says Campbell. Not only was First Command challenged with what to keep and for how long, but how to go back and find it when needed?

The concern extends beyond basic records management and directly ties to another growing compliance concern — e-Discovery. "All it takes is one angry investor," says Campbell. "They can file a lawsuit whether it is based in truth or not. The burden of proof falls on the provider to comply with e-Discovery requests." It becomes a balancing act of being able to provide the right information, without necessarily giving them too much information.

Regardless of industry, all government audits work in much the same way when it comes to compliance in the content management corner of the world. "You have to be prepared, regardless of industry, when they [the auditors] come in and say 'I want all of your records that concern this keyword or that were accessed or modified between these dates," says Campbell. "If they want to know what our website looked like on September 22, we have to be able to provide that information."

OPT FOR CASE-BASED ARCHITECTURE

Campbell says that First Command had identified three major challenges to overcome when addressing its content management chaos. First, it had to create an architecture that all future content would be founded upon. Second was going to be getting all 16 of its departments to agree on a standard methodology of how documents would be reviewed, approved, and stored. Finally, First Command wanted an application that could handle more than 30 types of documents and dynamically route them without human intervention to 16 separate departments for approval — all in a single workflow.

Regarding First Command's vendor search, according to Campbell stability, analyst and customer ratings, and feature sets were all initial drivers in narrowing the contender pool. Equally important, however, were considerations such as licensing structure and development cycle time. Although important, price wasn't listed among the very top vendor requirements. "We weighed price concerns against pro-

ject priority. If it was something we had to have done right now, cost wasn't as much of a concern," says Campbell. "We also considered how much effort it would take to implement a vendor's solution. Would it require us to hire 10 consultants, or can we train ourselves to do it?"

According to Campbell, it was pretty clear early on that EMC was going to be the choice. First Command had looked at SharePoint early on, only to find that it didn't have nearly the features the company was looking for. Although Campbell admits that the original SharePoint consideration was in 2003, he points out that even with all the recent updates, SharePoint still doesn't have the full feature set that First Command required. "We were looking for a true, enterprise-class content management solution," he says. First Command took advantage of a full arsenal of tools available in the EMC Documentum xCP (xCelerated Composition Platform).

When it came to building the solution, Campbell says his team adopted a "case-based" application architecture strategy to meet its first challenge. Think of it as not trying to fit your square peg (aka your challenge) into a round hole (aka the solution). "You can't just shove everything into a file cabinet and expect to find it later. It gets really cluttered, really quick," says Campbell. "It's the same when you build an ECM system. Rather than just say 'here's a platform, go with it,' we dissected the use-case first and then built the solution around the needs we uncovered."

Establishing a common methodology for document review, First Command's second challenge, was met when Campbell and his development team took the department heads — all 16 of them — and sat them in a room together to create a list of all the doc-

ument types they used. When the list was completed, the discussion turned to determining what level of involve-
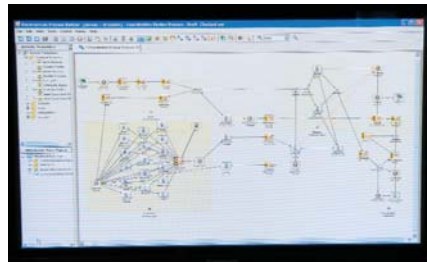
A complex workflow built on the EMC Documentum xCP enables First Command to automatically route items through various departments, speeding approval processes.

ment each group wished to have on each specific document. "We identified three different levels of involvement the department heads could select for each document type," says Campbell. "Required copy for those documents a department wanted to approve or sign off on, informational copy only for those documents a department only wanted an awareness of, and no involvement for those documents a department really didn't care about at all."

As a result of this meeting of the minds, First Command was able to meet its third stated challenge. "We invested the time up front talking to all the departments in the company," says Campbell. "We learned more than just the documents they used. We went deeper than that to learn up front how the reviewed information and which information needed to be tracked and captured."

From this, Campbell and his team were able to create the matrix used to build comprehensive workflows to route documents through the organization electronically and automatically. Building these complex workflows was accomplished largely through the use of Documentum's Process Builder,

which was used to automate the routing of documents, streamlining the approval process. Simple forms were created for users to enter information. Based on the document type, the Documentum system automatically routes the documents to the appropriate departments for review and approval. In any case where revisions are required, the Documentum system also can route the document back to the original author. The system also provides built-in file security, enabling document owners to control which users can access the document as it travels through the workflow process. This is a critical feature when compliance is taken into consideration, since access by other departments can be limited once the document reaches the legal department for review.

"This takes the guesswork out of the process, so no one is left wondering where a document should go and who should approve it. It's all predetermined," says Campbell. "With this tool, we have shaved weeks off the time it takes to get documents through our extensive layers of approval."

The entire enterprise is currently using TaskSpace (part of EMC Documentum xCP) to route all internal and external communications. "Since we took the time to architect the solution thoroughly, anyone can quickly find a document, build reports based on document metadata, or easily quantify how many documents each department was producing," says Campbell. First Command could also identify people who finished their assigned tasks quickly and efficiently, as well as identify bottlenecks in the process. "The longer we use the system, the more efficient we become which frees people to spend more time growing revenue. Using only the workflow capabilities of the platform has increased

our worker efficiency by 14%."

The new Documentum architecture has also satisfied one of the primary drivers of the overall project by creating a legal safe harbor, addressing compliance by reducing the organization's exposure to document-based liability. "Our legal and compliance teams love this system," says Campbell. If an auditor requests a versioning history for a document, First Command can quickly generate a report that provides a complete audit trail that shows exactly who reviewed the document, revised the document, and who ultimately signed off on it. "In today's regulatory climate, we are more exposed to legal action than ever before," says Campbell. "But with the solution in place, we have an e-Discovery tool that allows us to instantly retrieve documents without having to spend thousands of dollars hiring interns to do manual discovery." First Command has already been audited twice since the system went live, and although he can't give details beyond noting that no problems were

For another study on streamlining approval cycles, visit http://bit.ly/bxJLvC.

found, Campbell says that the solution has "already paid for itself in that regard."

In addition to meeting e-Discovery needs, the Documentum system also enables First Command to satisfy regulatory requirements concerning document retention. Most documents require secure archiving for up to seven years. Integrating the Documentum content management system with First Command's SAN (storage area network) has enabled the company to maximize costly storage resources by automating the archive process. The system identifies and stores highly used documents on the SAN, moving less-accessed documents to slower storage systems. "All of this is transparent to the user," says Campbell. "This allows us to remain compliant in our archive processes, without having to spend as much on SAN resources which come at a premium cost."

CAPTURE FUTURE SAVINGS

By automating and transforming First Command's document-related processes, the new document architecture based on the EMC

Documentum xCP has created new efficiencies, yielded significant cost savings, and strengthened regulatory compliance. Now, approvals that once took up to a week and required staff to physically walk documents from office to office can be accomplished in a matter of hours. Soft costs from efficiency gains alone are more than $200,000 at this point. Furthermore, when maintenance costs are figured in, Campbell calculates a net ROI of $5,567 per user will be realized in the span of three years. At an average of 175 users, this figure alone is nearly $1 million. Even more significant are the expected cost savings from regulatory and audit support. "Since we're now able to generate paperwork on the fly to support audits and respond to regulators' inquiries, the savings potential could run into the millions, not only from time and personnel savings, but through avoidance of fines and lawsuits," says Campbell. The old adage that time is money is no truer than in the financial services industry, and with the solution in place First Command is literally turning saved time into money. ■

COLLABORATION BRINGS PRODUCTIVITY CENTERSTAGE

First Command Financial Services, an investment advisory firm and banking organization, was recently a beta program participant for Documentum CenterStage, an enterprise collaboration system from EMC. First Command has extended the solution to its banking department to enable banking employees to work together, collaborating to develop unified documents for the department's policies and procedures manual. The solution eliminates document redundancy through collaboration, with authorized users all working on a single,

master document in the system rather than on multiple copies distributed through email or saved on personal desktops.

First Command sparked collaboration in its banking division using EMC Documentum CenterStage.

"We have already started an early pilot, which enables banking employees to log in and begin working with their documents [depending on their security level]," says Chris Campbell, Documentum architect at First Command. The system also publishes a complete new policies binder when revisions are made, pushing it out to all departments automatically. "Now, whenever anyone needs to access the latest approved version, it's right there online. No more worrying whether it's correct or out-of-date."