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**WV State Treasurer's Office**  
**Solicitation# CRFP STO2000000002**

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*Proposal for*

WV State Treasurer's Office

**Solicitation #CRFP STO200000002 – Comprehensive Records Assessment**

*Prepared for:*

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Department of Administration, Purchasing Division  
2019 Washington St. East  
Charleston, WV 25305-0130

Solicitation # CRFP STO2000000002  
Buyer: Melissa Pettrey

**WV State Treasurer's Office**

*Prepared by:*

---

**Cohasset Associates, Inc.**  
**VS0000020740**

Karen Knight, CCEP, [karen.knight@cohasset.com](mailto:karen.knight@cohasset.com)  
Principal Consultant  
312.718.8855

January 6, 2020

January 6, 2020

Department of Administration, Purchasing Division

Solicitation # **CRFP STO200000002**

Buyer: Melissa Pettrey

**WV State Treasurer's Office**

Good day:

Cohasset Associates, Inc. (*Cohasset*) is pleased to submit its proposal, responsive to **Solicitation #CRFP STO200000002 – Comprehensive Records Assessment** for the WV State Treasurer's Office (*WVSTO or the Agency*).

My consultant colleagues and I are confident that our experience and expertise will enable the Agency's information governance program success.

We look forward to the opportunity to be of service. Please contact me should you have any questions.

Respectfully presented for your consideration and approval,

*Karen Knight*

cc: Carol Stainbrook, [carol.stainbrook@cohasset.com](mailto:carol.stainbrook@cohasset.com)

Executive Director, Consulting Practice

612.839.0998

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Principal Consultant

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Michael Haley, [michael.haley@cohasset.com](mailto:michael.haley@cohasset.com)

Principal Consultant

908.642.3582

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## Goals, Scope and Planning

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### Goals and Objectives

Like many states and their agencies, the WV State Treasurer's Office creates or receives, and retains growing volumes of information, particularly information stored electronically (ESI). Today's litigation and regulatory complexities increase the challenges of managing this information unless governance is instituted **and** sustained in program form.

In support of its Comprehensive Records Assessment initiative, the Agency is requesting consultative services to provide:

- A comprehensive, **current-state assessment** of its information-related storage, retrieval and destruction practices and processes, supporting policies and documents, and governance framework
- A program refresh **implementation roadmap** in a multi-year, phased timeline
- **IG Program documents**, including **Retention Schedule** reports
- **Training**

### Scope

This proposal addresses both the paper and ESI assets associated with the WVSTO, with deliverables responding accordingly. While this proposal will not include an imaging deliverable, it will assess the efficiency of the Agency's current imaging project.

### Work Program

Preliminary planning is necessary to achieve the above objectives.

#### Preliminary Planning

- ▶ **Designate an Engagement Manager from the Agency**
  - Cohasset recommends that one person from the WVSTO be designated as Cohasset's primary contact. This individual will be responsible for activities such as scheduling interviews, meetings and meeting rooms and coordinating with the Agency's subject matter experts relevant to this engagement.
- ▶ **Gather and provide relevant documentation**
  - Cohasset asks that the engagement manager collect the following types of documentation and provide it to Cohasset, preferably prior to on-site data collection. Cohasset stresses that it **does not** ask that the documentation be developed if it does not exist:

- ◆ Organization Chart(s)
- ◆ Existing policies and standards supporting various information-related disciplines (Code of Conduct, legal hold notification and discovery, privacy, information security, data breach notification, disaster recovery and business continuity)
- ◆ Enterprise-wide retention schedules and / or department-established procedures that specify retention time periods
- ◆ Legal Hold policies, procedures and templates
- ◆ Documentation on the current management of electronic records, or pertaining to existing content management systems

### Engagement Management

#### **Satisfies 4.4.2.3 / 4.2.2.5 / 4.2.2.6**

During this engagement, Cohasset will provide monthly progress reports to the Agency's engagement manager.

The Agency will retain the rights to all deliverables.

All deliverables will be provided in editable, electronic formats.



## Deliverables

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### Item 1 – Assessment and Discovery

#### Data Collection

##### Satisfies 4.2.1.1

The data collected during the interviews are the foundation for all deliverables; accordingly, the quality and comprehensiveness of the information collection is **critical**.

In addition to reviewing the existing information provided by the engagement manager, Cohasset will collect information through multiple interviews with individuals representing certain Agency departments or functions, as they may exist:

- ▶ Staff, business and process owners across the Agency's organizational structure who can describe their information, current information lifecycle management practices, and share successes, issues or concerns for their most important information.
- ▶ Regulatory compliance functions, to assure Cohasset appreciates the information-related legal and regulatory obligations.
- ▶ Records and information management (includes records custodians and warehouse staff)
- ▶ Legal hold functions
- ▶ Information technology
- ▶ Information governance disciplines (privacy, information security, data breach notification, contract / vendor management, disaster recovery and business continuity)

Cohasset expects to conduct up to four (4) days of interviews at (1) the WVSTO in the State Capitol or at (2) its offices at the Kanawha City Complex.

- ▶ Most interviews should be scheduled for 60-90 minutes and may include more than one person.
  - It is recommended that a single conference room at either the State Capitol or the Kanawha City Complex locations be scheduled to convene all interviews. This will save the time required to move among interview rooms.
    - ◆ Alternatively, individuals representing remote locations may participate via teleconference.
- ▶ Interviews should be scheduled in full days that are consecutive, to maximize productivity.

Through many years of Cohasset engagement management, across a variety of settings and industries, this interview methodology is well-proven in encouraging employee participation, enabling robust data gathering, all while building rapport. This level of stakeholder involvement supports and empowers employees to *do what is right* when managing information assets.

## Item 2 – Reports and Documents

### Maturity Assessment

#### Satisfies 4.2.1.2.1 / 4.2.1.2.4 / 4.2.2.2 / 4.3.1.2

In developing the information governance (IG) assessment, Cohasset will:

- ▶ Evaluate the current state (the maturity) of Agency recordkeeping, to include:
  - IG Program documents; practices, means and methods; technology
  - Staffing, reporting alignment; training; structure and budget
  - Collaboration and integration with crucial information-related disciplines or functions, to include Privacy, information security, audit; contract review, etc.
  - FOIA and regulatory compliance; legal hold processes
  - Information-related culture and perceptions
- ▶ Collect recordkeeping-related feedback from stakeholders

The Maturity Assessment will be organized, as in the below excerpt (**hypothetical content**):

<b>DISPOSITION</b>		
<b>Principle:</b> Information is destroyed at the appropriate time, in the regular course of business, in accordance with standardized processes.		
<b>Current State</b>	<b>Advancement Opportunity</b>	<b>Priority H / M / L</b>
<ul style="list-style-type: none"> <li>● The existing Records Management Policy references disposition in its policy statement.</li> <li>● Over-retention of information is prevalent.</li> </ul>	<ul style="list-style-type: none"> <li>● Develop Standards that require a regular process of applying the retention schedule to dispose of information.</li> <li>● Incorporate an annual disposition process as part of the Program Standards.</li> </ul>	<b>High</b>
<ul style="list-style-type: none"> <li>● Disaster recovery (DR) media is separated from archival media.               <ul style="list-style-type: none"> <li>○ Disaster recovery media is needed short-term to facilitate recovery from a technical or physical disaster.</li> </ul> </li> <li>● Archival media is used to store information that has ongoing retention requirements but is not actively used.</li> </ul>	<ul style="list-style-type: none"> <li>● The ISO standard that addresses disaster recovery is ISO standard 17799. Paragraph 10.5.1(c) of the ISO standard states:  <i>"The extent (e.g. full or differential backup) and frequency of backups should reflect the business requirements of the organization, the security requirements of the information involved, and the criticality of the information to the continued operation of the organization"</i></li> <li>● Exclude disaster recovery media as information preserved through a Legal Hold.</li> </ul>	<b>Medium</b>

- ▶ As graphically illustrated above, advancement / change management / strategic opportunities will be detailed using:

- Recordkeeping standards, as defined by the Sedona Conference, ARMA, AIIM, ISO, and interpreted and applied practically by Cohasset
- Recordkeeping forecasts and trends
- The relevance of and compliance with Federal, State, Local and industry laws, rules and regulations

## Assessment Dashboard

### Satisfies 4.2.1.2.1 and 4.2.1.2.4

Cohasset uses proprietary assessment methodology and its four maturity definitions to rank the assessment findings, [relative to each other](#). As the below excerpt illustrates, (**hypothetical content**) the Maturity Assessment Dashboard© will summarize and rank the detailed assessment findings.

Ad Hoc	Inadequate	Coordinated	Operational
The <b>Agency is unaware</b> of its information governance (IG) responsibilities. Ad hoc practices exist, are makeshift and based upon habit or tradition. Program elements fall short of industry, legal, regulatory or other standards.	The <b>Agency is aware</b> of its information governance responsibilities. IG Program elements are ill-defined and specific actions must be taken to correct sub-standard practices.	The <b>Agency is acting to address</b> its information governance responsibilities. IG efforts are coordinated across departments, with certain improvements defined, and initiated or deployed. Legal and regulatory exposures are somewhat mitigated.	The <b>Agency has imbedded</b> information governance as a critical element of its business infrastructure, practices and culture. IG Program elements align with organizational goals and serve as evidence of reasonable compliance with laws and regulations.
Authorized IG Program	Leadership support	Data breach protection	Information as an asset
IG Program accountability	IG Program staffing	Privacy	Information Security
Retention Schedule	IG Program training	Business Continuity Plan	
Defensible deletion	Compliance testing	Vendor governance	
	Legal Hold Program		

## Strategic Implementation Roadmap

### Satisfies 4.2.1.2.4 / 4.2.1.2.6

An Implementation Roadmap will detail the strategic / change management / advancement opportunities outlined in the Assessment, in a multi-year timeline, using risk vs. benefit implementation sequencing.

The Roadmap will serve, long-term, as guidance and support for information management-related staffing, budgeting, performance goal-setting and project or initiative planning as the Agency advances from current state to sustainable information governance.

### Where to Store / Share Matrix

#### Satisfies 4.2.1.2.6

The data collection interviews will be structured to enable the development of a strategy for where information should be stored for efficient and effective sharing, retrievability, disposition, etc. based on content attributes, such as its importance and risk.

The Matrix will address the *structured information* housed in systems, business-specific applications, data warehouses and other locations, and the *unstructured information* stored in content management solutions, file shares, home / user drives, email, and other locations.

The Matrix provides an analysis of the benefits and risks associated with each of the Company's current storage solutions, ranking each of the following information governance attributes:

Integrity	Retention
Collaboration	Disposition
Content Security	System Security
Usability	Recoverability

Additionally, this strategy will guide the Agency as it considers potential hardware or software needs.

### IG Program Policy and Policy Statements and Standards

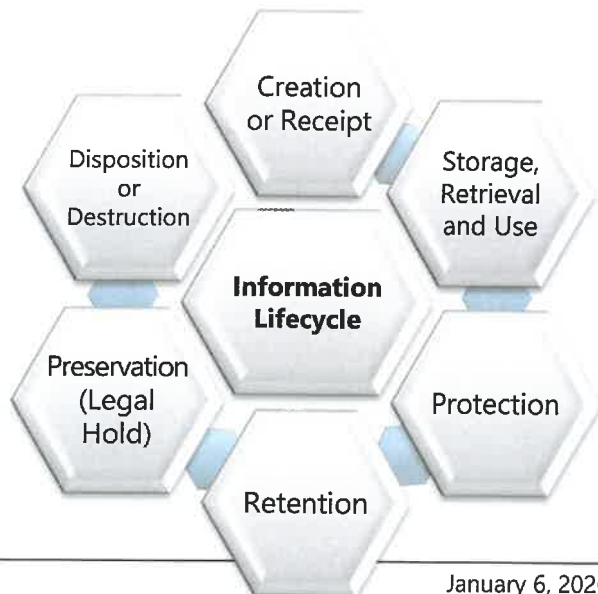
#### Satisfies 4.2 / 4.2.1.2.4

Cohasset will draft a high-level Policy (no longer than four pages) that *authorizes* the IG Program and serves as the base directive for all Agency employees regarding acceptable recordkeeping practices.

Cohasset will also draft policy statements and standards. Policy statements define the comprehensive platform upon which the WVSTO will be guided in the management of its information risks.

Standards support the policy statements by providing descriptions of what is to be achieved.

These will include:



- ▶ Guidance to modernize the Agency's records program
- ▶ The purpose and scope of the program
- ▶ Definitions of critical IG terms

These policy statements and standards will define requirements for managing information throughout its lifecycle. Information lifecycle management (ILM) is a concept fundamental to the recordkeeping profession. It is the series of activities through which information develops and functions and during which it must be governed.

These activities have their basis in International Standards Organization (ISO) standards, specifically, ISO15489.

The elements of ISO15489 are extensive. They include findability; accessibility; business context; immutability; preservation, and many others that are critical, and reflect stages, phases or constituent conditions of the predominant six (6) elements, illustrated for clarity.

## IG Program Organization Framework

### **Satisfies 4.2.1.2.4**

Cohasset will prepare a framework, defining explicit IG Program roles and responsibilities across the Agency, designing an appropriate program council.

- ▶ Council membership will be identified to direct the governing body; oversee reasonable implementation of advancements; address issues and concerns; and measure and report results.
- ▶ Program working groups (standing and ad hoc) will be guided by the council and established to implement council recommendations.

Cohasset will prepare a charter for the interdisciplinary, program governance body - a Council, (steering committee, work group, etc.) - that includes legal, human resources, information technology, compliance and ethics, privacy, records management, archiving, etc.

Cohasset will also review the Agency's Code of Conduct or similar ethics document, and other governance programs / documents / processes to identify opportunities to embed information governance requirements.

If practical, existing committees and roles will be leveraged to eliminate redundancies and streamline the council structure.

## Retention Schedule Reports

### **Satisfies 4.2.1.2.2**

Cohasset's two retention schedule deliverables will be:

- ▶ Easily understandable

- ▶ Actionable, sustainable and practical
- ▶ Applicable to all information, including physical records and ESI
- ▶ Defensible, based upon recordkeeping requirements (legal, regulatory, etc.)

Cohasset will refresh the WVSTO's existing record retention document and reconfigure it as a Functional Retention Schedule (FRS). Cohasset's retention schedule refresh deliverables will include:

1. A **Functional Retention Schedule (FRS)** to describe the functional groupings, retention categories and retention time frames
2. A **Legal Citations Report** to specify the regulatory and other authorities that govern the retention of its information, correlated to each FRS category

### Retention Schedule Report

The Retention Schedule Report, illustrated using the below **hypothetical excerpt**, will serve as the Agency's Functional Retention Schedule (FRS).

- ▶ This report will be organized by the business function, purpose or use (**Functional Group**) of the information
- ▶ Within each functional group, **Retention Categories** will detail the different information types and their retention time frames

<b>Finance, Accounting and Tax</b>		<b>Functional Group</b>
<p><b>FN20 Assets, Obligations and Debt Accounting Support</b></p> <ul style="list-style-type: none"> <li>• Accounting support for assets impacting multiple tax years, such as capital assets, real estate holdings and investment deals.</li> <li>• Mortgages, debt instruments, financing arrangements, private placements, and debt compliance records for obligations incurred</li> <li>• Records of monies due as collectible</li> </ul>	<p><i>Final Business Record</i></p> <p>Disposition of asset, obligation or debt + 10 years</p>	
		<b>Retention Category</b>

To aid in the application of retention time periods to Agency information, and facilitate compliance, Cohasset will:

- ▶ Simplify the recommended retention periods
- ▶ Limit the number of different time periods and conditional (event-based) retention periods
- ▶ Minimize the use of *Permanent / Indefinite* retention time frames
- ▶ Write FRS retention categories in a manner to enable users to easily locate their specific categories and retention time frames.

## Legal Citations Report

For the Retention Schedule with Legal Citations Report, as illustrated by the below **hypothetical excerpt**, Cohasset will identify the authorities that regulate Agency operations.

<b>Legal Matters</b>		
<b>LM10 Agreements and Contracts</b> Contracts and agreements with external parties for products and services.		<i>Final Business Record</i> Expiration of Contractual Obligations + 7 Years
LA6Y	Alabama	Ala. Code § 6-2-34
LA4Y	Alabama	Ala. Code § 6-2-36
LA3Y	Alabama	Ala. Code § 6-2-37
LA4Y	Alabama	Ala. Code § 7-2-725 (1)

Cohasset will use its citations database of over 35,000 statutes and regulations to compile the retention requirements into a legal citations report.

- ▶ The research associated with this report renders the FRS defensible
- ▶ This report will serve as a resource, *behind the scenes* from the day-to-day user, for the Records / IG team members and for stakeholders in Compliance, Legal, Tax, Risk Management, etc.

The above-referenced Reports 1 and 2 will be developed and the Report-outs as described below will be conducted. Because the state processes / requirements for such are unknown, this proposal **DOES NOT** include any consultant work, time or costs for NARA-related or similar official / administrative review, refinements and approvals of the two Reports.

## Report-out

### Satisfies 4.2.1.2.5

Cohasset will travel on-site (for 2 days) to present Maturity Assessment findings and to introduce to the WVSTO Records Committee and to Senior Staff all the deliverables detailed in the preceding pages and listed in the below table:

Assessment Dashboard	Policy	FRS
Strategic Implementation Roadmap	Policy Statements and Standards	Legal Citations Report
Where to Share Matrix	Governance Framework	

## Item 3 – Training

### Satisfies 4.2.1.3

## Information Governance (IG) Program and Functional Retention Schedule (FRS) Training

Cohasset will develop and deliver three (3) customized education and training modules, as described:

Attendees	Subjects / Content	Construct / Delivery Method
1. Employees	New, refreshed FRS	PowerPoint
	Basic overview of IG	Graphics and text
		Speaker's notes to support future <i>train-the-trainer(s)</i>
		In-person
2. Management	IG importance	PowerPoint
	How to train and educate employees on IG and FRS	Graphics and text
	On-going strategy for IG adoption by employees	In-person
3. Employees / New Hires	FRS	PowerPoint
	Basic overview of IG	Graphics and text
	Test questions	Computer-based Training (CBT)
	Completion certificate for personnel file	Speaker's notes to support <i>voice-over</i> , if desired by Agency

Cohasset will develop Modules 1 and 2, as described above, and will travel on-site (for 2 days) to conduct at least six employee training and education sessions using Module 1; during the same on-site visit, Agency management will be trained using Module 2.

Module 3 will be developed as described above and provided to the Agency's HR or Training department for adaptation to and installation in its Learning Management System (LMS).



## Qualifications and Experience

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### Independence

#### **Satisfies 4.2.1.2.6 / 4.3.1.1**

Cohasset is a technology-agnostic information governance / recordkeeping consulting firm. It has NO sales or marketing association with any software or hardware firm or product, nor does it have an interest in recommending specific products.

Cohasset does, however, have extensive knowledge of the information governance-centric functions and capabilities of most software and hardware. Cohasset is routinely engaged by major software and cloud service providers to evaluate their products against recordkeeping industry, SEC, FINRA, ISO and other standards.

### Consultants

#### **Satisfies 4.3.1 / 4.3.2**

Given that a program assessment will guide the direction of an organization's recordkeeping over multiple years, Cohasset will leverage the thought-leadership and executive-level experiences of their Principal Consultants to staff this engagement.

With over 50 years of combined information governance experience, the four consultants introduced below have conducted dozens of Maturity Assessments and have delivered hours of training, as is described within this proposal. Those clients have employee bases that range from 40 to 160,000 employees and span multiple global and multi-national industries. Additionally, the consultants have conducted 2 – 6-hour maturity assessment workshops (training) for international information governance seminars, conferences and summits.

Karen Knight will lead the engagement, as well, prepare the policy, program and training-related deliverables. Teresa Drabenstadt, Darron Dickinson or Michael Haley, dependent on their availability, will assist the lead consultant, as well manage and deliver the FRS and technology aspects of this engagement.

**Karen Knight, CCEP**, is a Principal Consultant with Cohasset.

Her experience as a Chief Compliance Officer for over 20 years informs her consulting engagements. Karen's design of compliant and sustainable information governance programs includes governance policies and standards, legal hold processes, retention schedules, training and education, and technology enablers.

Mitigating the regulatory and legal risks of governing information, Karen integrates and aligns records management and information governance disciplines, addressing privacy, information security, ethics and compliance, contract and procurement, and data breach prevention.

She is an author, and a frequent speaker and workshop leader on these and many other information-related topics.

**Teresa Drabenstadt, MBA/CISA/PMP**, is a Principal Consultant with Cohasset.

In her prior employment, she led the ARMA Cobalt Award-winning Information Governance Program for a multi-line insurance company in Madison, WI. (The Cobalt Award was granted to one organization each year to recognize excellence in records and information management, in comparison to The Generally Accepted Recordkeeping Principles). She has spoken at several conferences regarding their information governance journey. Teresa has over 20 years of business leadership experience in Information Technology, Compliance, Privacy and Internal Audit. She has led many large-scale transformational projects, resulting in increased efficiency, improved controls and decreased long term costs.

**Darron Dickinson, MBA / MSCIS**, is a Principal Consultant with Cohasset.

Darron leads compliance assessments of vendor solutions in comparison to the WORM requirements stipulated by the Securities and Exchange Commission Rule 17a-4(f), which were also adopted as FINRA Rule 4511.

Darron has over 20 years of experience in operational and technology leadership roles. In 2001, Darron began his career by leading business operations through the design, development and deployment of imaging and content management solutions. In a role as Chief Information Officer, Darron was responsible for all aspects of information technology and data security at a publicly-traded financial institution.

Darron's more recent focus is on leveraging cognitive technologies, with its potential to automate and streamline information lifecycle management.

**Michael Haley, MBA, IGP** is a Principal Consultant with Cohasset Associates.

Michael joined Cohasset in 2002, following a career in the insurance industry. During that career, he developed and implemented an enterprise-wide records management program, for over 50 million client files and approximately 1,000,000 boxes of inactive paper records.

Michael works with clients to refresh and strengthen their information management programs, assessing current program results, preparing continuous improvement roadmaps and leveraging technology to apply automated retention controls to all information.

## Competitive Advantage

Drawing on more than forty years of experience, Cohasset provides its clients with innovative advice on managing their electronic information as the digital age creates operational paradigms, complex technical challenges and unprecedented legal issues. Twenty-seven years ago, Cohasset was first to envision the need to manage electronic records and convened an annual MER (Managing Electronic

Records) Conference. Recognizing the expert content, attendees are global, spanning nearly all industries.

Among many factors, Cohasset's competitive advantage is largely attributed to its:

- Extensive experience as one of the leading professional consulting firms in the nation, specializing in information governance
- Seasoned, professional consultants who individually, bring over 20 years of expertise to their engagements
- Collaborative work style with clients, assuring that deliverables are customized to operate within client culture, capabilities and technology environments

## Industries and Geography

Cohasset provides the services detailed in this proposal, and many others, for domestic and multi-national clients in the federal, municipal, not-for-profit, education, and professional and financial services sectors, and in the pharmaceutical, insurance, retail, entertainment, dot.com, healthcare, manufacturing, energy and utility industries.

## Case Study References

### Addresses 4.3.1.4 / Satisfies 4.3.1.2

- Cohasset is currently working with a global retail client to advance its records and information management practices. Their retention schedule has been refreshed. An information inventory has been completed. Strategies have been developed to address retention and disposition recommendations for each of its repositories that retain electronic information (ESI). Implementation is underway.
- A technology client, having grown quickly from a few employees to a multibillion-dollar global presence, recently engaged Cohasset to develop and support their implementation of a records and information management program. Program deliverables are complete; they included policies, standards, a governance framework and a functional retention schedule.

If actual specific references are required, in consideration of the following, Cohasset requests that it be permitted **to provide references at the time of final award / contracting.**

- Many of Cohasset's clients' ethics and compliance rules prevent their endorsement of any vendor, provider or third-party, though we enjoy numerous, multi-year, ongoing relationships.
- Other of our clients' compliance or legal obligations, in some instances, *dilemmas*, preclude them from discussing their information-related challenges and responsive consultative engagements.

- ◆ This type of dialog with external parties puts them in the difficult position of having to affirm that / why certain services were necessary.
- ◆ This dialog is often prohibited by legal counsel.

Accordingly, Cohasset is **VERY** cautious about providing references, which is done only with the express permission of the referring client. This same caution will be exercised should the WVSTO become a Cohasset client. Meanwhile, a list of Cohasset clients who have authorized posting can be accessed at [www.cohasset.com/clients.php](http://www.cohasset.com/clients.php).

## Project Timeline and Administration

### Timeline

#### Satisfies 4.2 / 4.2.2.1

The below schedule approximates the time needed to prepare the deliverables. Total engagement time, once interviews begin, is just under 20 weeks (103 business days = +/- 140 calendar days).

It also approximates the timing for the requests for Milestone Payments.

ACTIVITY	TIME
Proposal acceptance	0
Engagement start	+ 2 to 3 weeks
Interview scheduling by Agency for Cohasset's on-site data collection	+ 3 weeks
<b>Item 1 - Assessment and Discovery</b>	
<ul style="list-style-type: none"> <li>CONDUCT <b>on-site</b> data collection</li> </ul>	up to 4 days
Milestone Payment Request	<i>at completion of data collection</i>
<b>Item 2 – Reports and Documents</b>	
<b>Items 2a</b> <b>DEVELOP:</b> <ul style="list-style-type: none"> <li>Maturity Assessment Report</li> <li>Roadmap</li> <li>Where to Share Matrix</li> <li>Policy, Policy statements and Standards</li> <li>Governance Framework</li> </ul>	+ 7 weeks (35 days)
Milestone Payment Request	<i>at delivery of 2a Items</i>
<b>Items 2b</b> <ul style="list-style-type: none"> <li>DEVELOP two (2) Retention Schedule Reports</li> <li>CONDUCT <b>on-site</b> report-outs of 2a and 2b deliverables to WVSTO Records Committee and Senior Staff</li> </ul>	Developed in parallel with 2a deliverables + 2 additional weeks (10 days)  + 2 days
Milestone Payment Request	<i>at delivery of 2b Items</i>
<b>Item 3 - Training</b>	
<ul style="list-style-type: none"> <li>DEVELOP employee and management training and education modules</li> <li>CONDUCT <b>on-site</b> training and education for WVSTO Staff</li> </ul>	+6 weeks (30 days) + 2 days

ACTIVITY	TIME
• DEVELOP employee CBT version	+ 4 weeks (20 days)
<b>DAYS ELAPSED</b>	<b>4 + 35 + 10 + 2 + 30 + 2 + 20 = 103</b>
FINAL PAYMENT INVOICING	+ 5 days

### Administration

The start of this engagement must be a function of the consideration of Cohasset's other client work at the time this proposal is accepted. Ordinarily, engagement initiation planning can begin within 2-3 weeks of acceptance.

Analysis and report preparation will be performed at Cohasset offices.

This proposal expires when all deliverables are prepared and delivered, but not beyond **July 1, 2021**.

As noted above in the Timeline and as documented on the Cost Sheet Attachment, Cohasset will request **Milestone / Progress Payments**.