

## Meet Compliance and Regulatory Requirements for Records Management with Microsoft 365

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# Foreword

This paper provides an overview of functional requirements from the ICA *Principles and Functional Requirements for Records in Electronic Office Environments, Module 2 (Guidelines and Functional Requirements for Electronic Records Management Systems)*, with a focus on how the Microsoft 365 platform has been supporting the standard or directly with out-of-the-box features and configuration, through customization using out-of-the-box features, or with solutions developed to fulfill them where required. This paper identifies areas for consideration as part of adopting Microsoft Cloud services as an organization's authoritative electronic documents and records management system (EDRMS).

The international standard known as *Principles and Functional Requirements for Records in Electronic Office Environments, Module 2 (Guidelines and Functional Requirements for Electronic Records Management Systems)* was first published by the International Council on Archives (ICA) in 2008. This module was developed by Archives New Zealand in conjunction with a joint project team formed by members of the International Council on Archives and the Australasian Digital Recordkeeping Initiative. The project resulted in three modules, collectively known as the ICA-Req. Specifically, Module 2 focuses on supporting organizations in ensuring that electronic records related to business activities are effectively identified, stored, retained, managed and disposed of through an electronic records management system. ICA-Req and ICA Module 2 have evolved since their publication into the ISO standard ISO 16175-1:2020, recently published in July 2020.

Despite its evolution into ISO 16175-1:2020, several governmental organizations still leverage ICA Module 2 specifically as the minimum set of requirements to support the government's EDRMS. The Government of Canada used ICA Module 2 from June 1, 2010, to May 4, 2022. Although ICA Module 2 has been replaced by ISO 16175-1:2020, many of the requirements are similar and have been modernized to allow organizations to

further benefit from the use of Microsoft 365 as their EDRMS. (Reference: [Government of Canada, Standard for Electronic Documents and Records Management Solutions \(EDRMS\), Appendix C: Requirements for a EDRM Solution](#)).

Although organizations have been quick to adopt Microsoft 365 as an organizational hub for communication, collaboration and productivity, many have not yet established Microsoft 365 as the organization's official records management solution. This hesitancy may be due to a variety of reasons, including:

- Perceived short-term costs and/or a perceived lack of benefit from migrating documents currently in traditional repositories (e.g., network file shares, legacy records management systems),
- Lack of prioritization by the organization,
- Absence of an identified need to move to a modern integrated solution, or
- Lack of information management (IM) maturity

The benefits and value to the organization from an information and records management perspective are dramatically increased as the organization's maturity level increases. Information management is not limited to adhering to a set of compliance mandates. Rather, as more maturity is achieved in information management by an organization, the quality, availability and integrity of information available to its members are higher and improve how they make effective evidence-based and informed business decisions.

Leveraging a formal cloud-based repository such as SharePoint Online as an EDRMS allows organizations to adopt modern tools with modern processes, fully interoperable and integrated with their existing set of office and communication applications — for example, Microsoft Outlook, Microsoft Office or Microsoft Teams.

# Executive Summary

Leveraging Microsoft 365 and SharePoint Online as an organization's primary EDRMS provides the ability to effectively fulfill compliance and regulatory requirements for information and records management, including those listed in the ICA Module 2 standard for electronic document management systems. It also provides a stable future-ready solution for adopting new standards, or changes to standards, as they are provided to the market with minimal disruption to the solution's design, configuration and end user experience.

The published ICA Module 2 standard identifies 275 guidelines and requirements for organizations to consider when evaluating solutions for suitability to meet industry-standard needs for electronic document and records management. A detailed review of these requirements was performed, and the outcomes demonstrated the ability for Microsoft 365 and SharePoint Online to directly support a majority of ICA Module 2 requirements with out-of-the-box Microsoft 365 capabilities and configurations. Where required, organizations will benefit from using out-of-the-box tools included in Microsoft 365 Enterprise licensing to build automated workflows, scripts and solutions using web apps to fulfill specific needs for their organization which are not immediately available for configuration. Organizations that have aligned their Microsoft 365 implementation to the ICA Module 2 standard will be able to transition to 16175-1:2020 in the future.

Additionally, for a minority of scenarios where using out-of-the-box capabilities and solutions built into

Microsoft 365 is not sufficient to meet a requirement, organizations may need to procure a third-party add-on or develop a workaround. In many cases, however, this would be true regardless of the platform and requirements — for example, offline backups which are independently stored and managed by the organization are typically not included in SaaS-based cloud services.

Overall, out of the 275 requirements included in the ICA Module 2 standard, the evaluation presented in this paper found that Microsoft 365 allows organizations to meet 217 requirements (79%) through out-of-the-box features and configurations; 34 requirements (12%) using Microsoft 365 solutions through automated workflows, web apps or scripts; and 24 requirements (9%) through a third-party add-on or workaround.

Microsoft 365 and SharePoint Online provide a mature platform for organizations to use as their primary EDRMS while supporting complex requirements from standards such as ICA Module 2. However, ICA Module 2 is an aging standard and organizations are encouraged to look to new standards which include modern requirements for records management. Migration to Microsoft 365 allows an organization to fulfill EDRMS requirements on a platform which also supports more recently developed standards, such as ISO 16175-1:2020. It provides the organization with a long-term solution which will continue to support their enterprise information management requirements for years to come.

# Records Management Overview

The ICA Module 2 was the standard for EDRMS for over a decade for organizations such as the Government of Canada and was refreshed as of May 4, 2022.

## What is a record?

For the purpose of evaluating a solution for an EDRMS, “record” refers to “information created, received, and maintained as evidence and information, by an organization or person, in pursuance of legal obligations or in the transaction of business.”<sup>1</sup> Organizations have a legal obligation to maintain an authorized retention schedule of their records based on a classification schema, retain it for its retention duration, and dispose of it on completion of its life.

Records are associated not only with the core information of a record (e.g., the content of a document), but also the associated metadata to provide additional context and structure for managing the information within an EDRMS. Metadata for files within an EDRMS “identifies, authenticates and contextualizes records and the people, processes and systems that create, manage, maintain and use them and the policies that govern them.”<sup>2</sup> Metadata allows an organization to manage, protect, and disseminate information effectively and consistently.

## What are the characteristics of an EDRMS?

Records are created and captured in an EDRMS to be managed, maintained and disposed of according to their lifecycle. Records inside of an EDRMS must have:

1. **Authenticity:** Authenticity ensures that a record can be proven it is what it is identified to be; records must be managed in a way to allow for the organization to have a defensible position on the content and record metadata (e.g., the author, editor, when it was created, etc.).
2. **Reliability:** Reliability ensures the representation of a record and its metadata are represented completely and accurately, and can be depended upon throughout the life and disposal of the record.
3. **Integrity:** Integrity for records requires they are complete and unaltered, as well as protected from unauthorized modification or deletion.
4. **Usability:** Usability provides the value that is derived from the record, and consists of how the record can be located, retrieved, preserved and interpreted.

## Risks and opportunities

Lack of an effective EDRMS which meets both the policies and procedures of an organization as well as common industry-leading practices for records management leads to an increasing and ongoing risk level. The high-level risks include:

- **Operational risk:** Lack of managing records leads to difficulty accessing relevant and correct information when necessary, making it difficult to analyze a situation using existing intelligence and evidence which is part of the organization’s body of knowledge. Decisions will be made which do not reflect all, or the correct, information that would have otherwise been included for defining a path forward.

<sup>1</sup> International Standard on Records Management, ISO 15489.

<sup>2</sup> International Standard on Information and Documentation – Records Management Processes – Metadata for Records, ISO 23081.

In addition, the impacts to knowledge worker productivity in finding the right information are well documented. A [2018 International Data Corporation \(IDC\) study](#) found that “data professionals are losing 50% of their time every week” — 30% of that time is spent searching for, governing and preparing data while 20% is spent duplicating or recreating information.

- **Reputational risk:** Lack of effective records management will eventually lead to accidental or malicious leakage. Information without classification and/or well-defined handling protocols may eventually be shared inappropriately and without the correct context. The inadvertent sharing of private or sensitive information, whether in a public forum or internally within an organization, is considered a security and/or privacy incident, and may invoke a reportable data breach which can ultimately lead to a loss of trust, which may in turn cripple the organization’s future.

A [2021 study conducted by the Ponemon Institute and IBM Security](#) found that the average cost of a data breach for Canadian organizations was \$5.35 million, up 10% from the previous year, with an average of 24,400 records exposed in each of 26 breaches studied that year. While many organizational factors contribute to the potential

for data breaches, having well-defined classification mechanisms for records and sound record handling practices can greatly reduce the risk of data breaches and reputational risks.

- **Legal or regulatory risk:** Organizations have legal obligations to maintain, manage and dispose of records according to a schedule. Non-compliance with these requirements has legal consequences. Additionally, over-retention of information can lead to over-exposure in litigation or legal discovery processes, and potential legal consequences.

Implementing a modern EDRMS vastly reduces enterprise risks and provides additional opportunities which are of benefit across the organization, at all levels. These benefits include:

- Improved findability and accessibility of information,
- Improved identification of a source of truth with context for the end user,
- Improved efficiency through access to more information and avoidance of redundant or duplicate efforts, and
- Improved operational security through information classification which allows for a standardized and efficient method for managing access.

# ICA Module 2 Functional Requirements and Microsoft 365

The ICA Module 2 divides functional requirements into four sections, with relevant categories and sub-categories. Specific functional requirements presented for consideration in selecting an effective EDRMS are defined at the category and/or sub-category levels. Across the four sections, there are a total of 275 functional requirements presented directly in the published ICA (Principles and Functional Requirements for Records in Electronic Office Environments) Module 2 document.<sup>3</sup>

Section	Category	Sub-category	# of Req.
1. Create	Capture	Capture processes	9
		Point of capture metadata	11
		Aggregation of electronic records	5
		Bulk importing	2
		Electronic document formats	2
		Compound records	2
		Email	6
	Identification	(none)	7
	Classification	Establishing a classification scheme	13
		Classification levels	9
		Classification processes	15
		Record volumes	6
	2. Maintain	Managing Authentic and Reliable Records	Access and security
Access controls			1
Establishing security control			4
Assigning security levels			6
Executing security controls			6
Security categories			10
Records management process metadata			13
Tracking record movement			3
Hybrid Records		Management of electronic and non-electronic records	10

<sup>3</sup> ICA Principles and Functional Requirements for Records in Electronic Office Environments Module 2

	Retention, Migration and Disposal	Disposition authorities	32
		Migration, export and destruction	14
		Retention and disposal of electronic and non-electronic records	9
<b>3. Disseminate</b>	Search, Retrieve and Render	Search, retrieve and render	27
		Rendering: displaying records	3
		Rendering: printing	13
		Rendering: redacting records	6
		Rendering: other	1
		Rendering: re-purposing content	1
<b>4. Administer</b>	Administrative Functions	Administrator functions	8
		Metadata administration	4
		Reporting	8
		Backup and recovery	6
		<b>Total</b>	<b>275</b>

## Evaluation methodology

In developing this paper, a detailed technical review was performed for each of the 275 functional requirements included in the ICA Module 2 standard, identifying the out-of-the-box Microsoft 365 features and configurations that are available to directly support that requirement.

If out-of-the-box Microsoft 365 features and configurations were not available to directly support the requirement, the review then sought to find light customizations, scripts or configurable automated workflows which can allow an organization to support the requirement. The light customizations, scripts and workflows considered are those which are already included with Microsoft Enterprise licensing.

Finally, third-party add-ons or workarounds were considered to support requirements in cases where the two initial options are not available.

For each ICA Module 2 requirement, the outcome of the review was categorized as follows:

- **Directly supported** — The requirement is directly supported by Microsoft 365 through out-of-the-box features and configurations. Features, capabilities and configurations across Microsoft 365 services were considered, including records management, information governance and information protections features in the Microsoft Compliance Center, SharePoint Online content services and information architecture, and Microsoft Search, as well as configurations within Microsoft Teams and OneDrive for Business.



- **Microsoft 365 solution supported** — The requirement may be supported through light customization, scripts or automated workflow that may be configured or built within the platform. To fulfill ICA Module 2 requirements, Microsoft 365 solutions which were considered included the built-in Power Platform, including Power Apps and Power Automate workflows, as well as PowerShell scripts which are already included with Microsoft Enterprise and/or standard licensing.
- **Add-on or workaround required** — A third-party add-on or workaround is required to support the requirement. Although third-party solutions are not specifically named in the report, there are numerous well-known options to fulfill the small set of requirements which fall into this category.

The ICA Module 2 standard further categorizes requirements using “must” and “should” to identify the criticality of a requirement in an effective EDRMS solution. For the purpose of this report, all requirements were evaluated, regardless of this categorization. However, a delineation between “must” and “should” is included in the detailed evaluation section later in the report.

## Overview of functional requirements and Microsoft 365 feature support

The following charts provide a high-level overview of the categorized ICA Module 2 functional requirements as they relate to Microsoft 365’s direct support for the requirement, whether a Microsoft 365 solution is required (light customization, script or automated workflow), or if a third-party add-on or workaround is needed.

The charts are presented by section (Create, Maintain, Disseminate and Administer) and divided by requirement sub-category in order to provide a high-level view into Microsoft 365’s ability to meet the requirements of the ICA Module 2 standard.

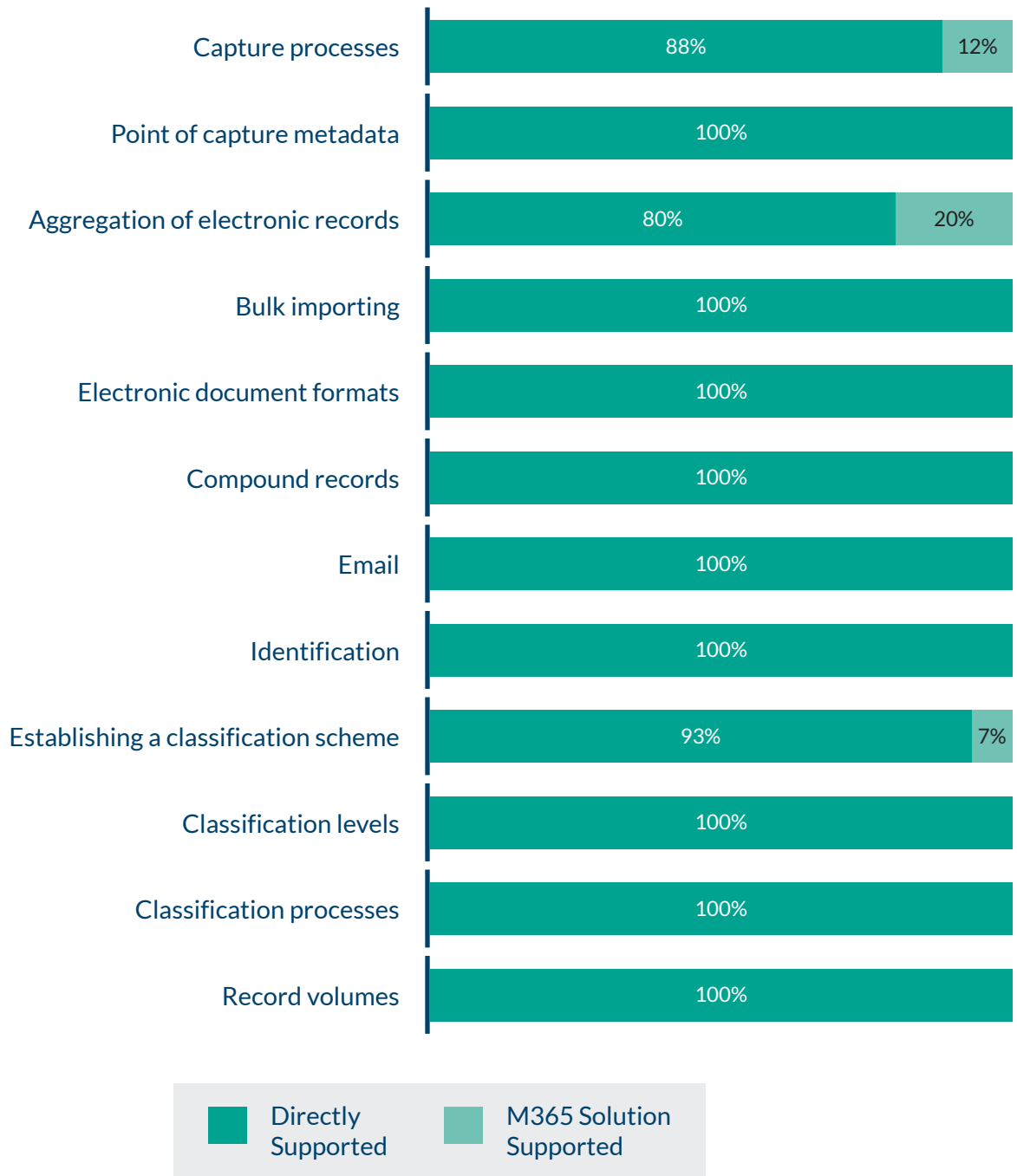


### Create

A total of 87 out of 275 requirements are categorized in the Create section, across 12 sub-categories.

Functional requirements in the Create section are designed to provide capabilities for organizations to effectively capture, identify, classify and store records.

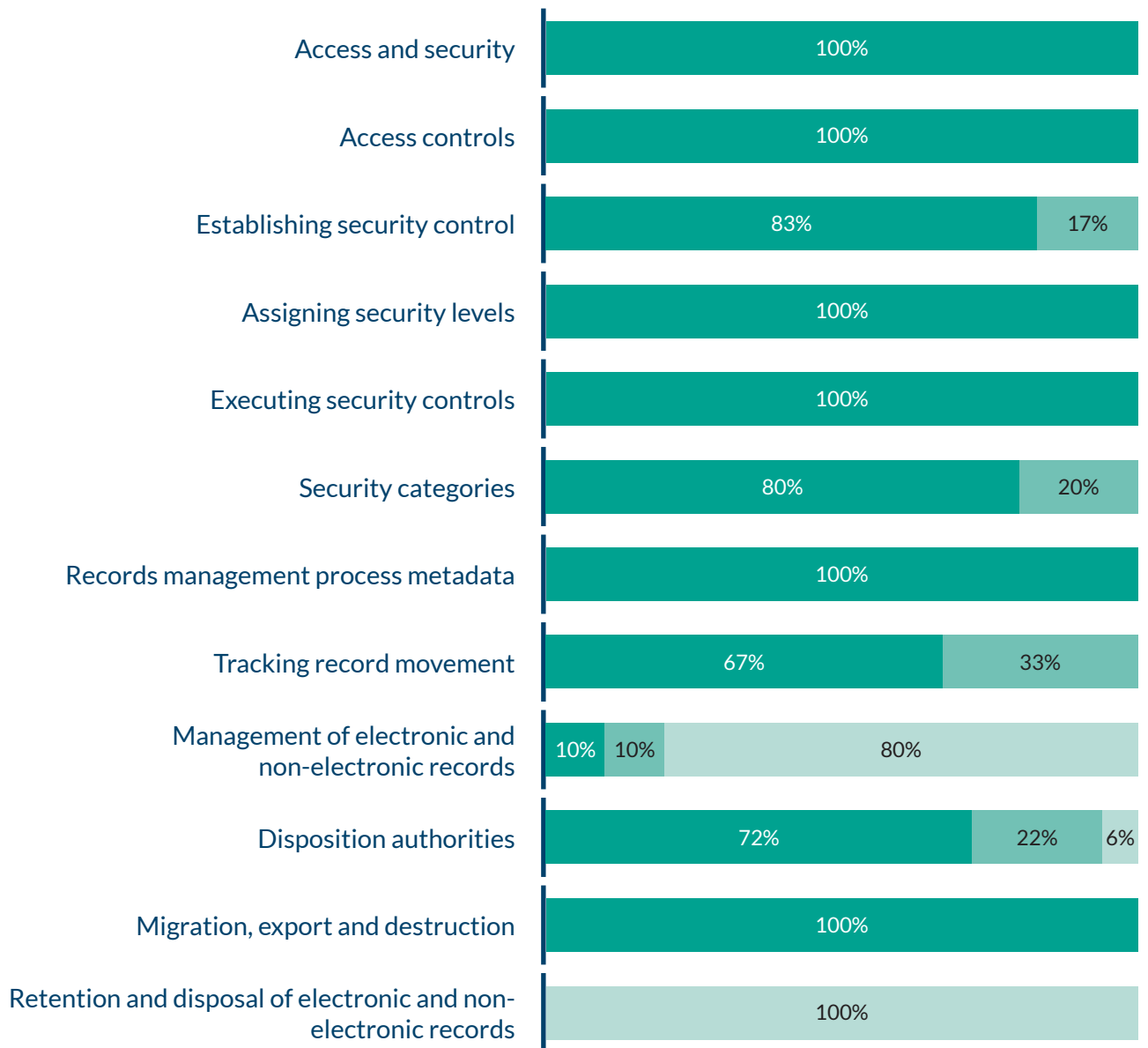
The following chart shows the level to which each sub-category of requirements may be achieved using Microsoft 365 out-of-the-box capabilities, whether light customization is required, or if a third-party add-on is needed.



The results of the evaluation found that 84 out of 87 requirements are fully supported by out-of-the-box Microsoft 365 capabilities, and three requirements are supported through a Microsoft 365 solution. No requirements in the Create section require a third-party add-on or workaround.

## Maintain

A total of 111 out of 275 requirements are categorized in the Maintain section, across 12 sub-categories. Functional requirements in the Maintain section are designed to enable organizations to secure, control, retain and dispose of records. The following chart shows the level to which each sub-category of requirements may be achieved using Microsoft 365 out-of-the-box capabilities, whether light customization is required or if a third-party add-on is needed.



Directly Supported



M365 Solution Supported



Add-on or Workaround Required

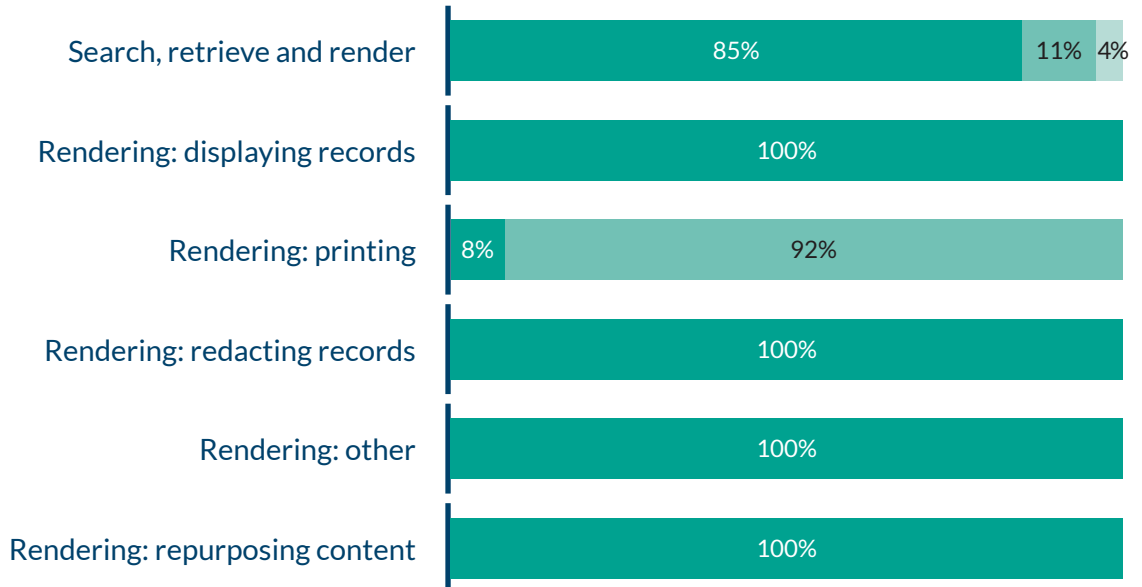
The results of the evaluation found that 78 out of 111 requirements are fully supported by Microsoft 365 out-of-the-box features and configurations. However, 13 requirements are supported through a Microsoft 365 solution, and 20 requirements rely on a third-party add-on or workaround.

Management of electronic and non-electronic records is listed as requiring an add-on or workaround as a physical records (non-electronic records) solution is not readily available using a default SharePoint Online site. Organizations requiring the inclusion of non-electronic records are able to successfully meet this requirement through taking advantage of extensibility of Microsoft 365 and SharePoint Online through a third-party add-on or investing the hours to use the additional tools available under the PowerApps platform as well as developing on SharePoint using the developer-friendly SharePoint Framework (SPFx).

Retention and disposal of electronic and non-electronic records also requires an add-on or workaround to fulfill ICA Module 2 requirements as the capability to manage non-electronic records must be added to SharePoint Online through the addition of metadata fields, automated workflows, customized search queries, and processes to support management and disposition of physical objects which are external to Microsoft 365.

### Disseminate

A total of 51 out of 275 requirements are categorized in the Disseminate section, across six sub-categories. Functional requirements in the Disseminate section provide organizations with capabilities to search, retrieve and render the records maintained by the EDRMS. The following chart shows the level to which each sub-category of requirements may be achieved using Microsoft 365 out-of-the-box capabilities, whether light customization is required or if a third-party add-on is needed.



The results of the evaluation found that 35 out of 51 requirements are fully supported by Microsoft 365 out-of-the-box features and configurations. However, 15 requirements are supported through a Microsoft 365 solution, and one requirement relies on a third-party add-on or workaround.

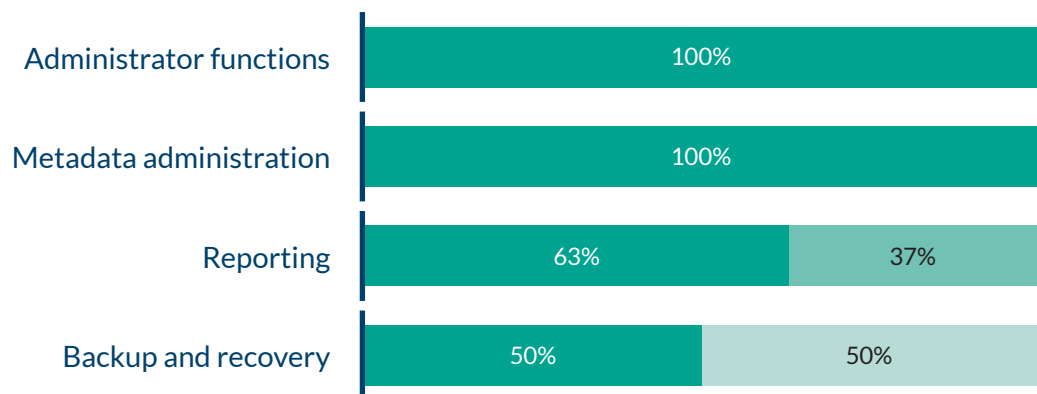
Search, retrieve and render requirements are, for a majority, supported in any SharePoint Online deployment. There exists a requirement for search results to include non-electronic records. As previously mentioned, a SharePoint Online add-on or custom solution using Microsoft 365 Enterprise features is required to support non-electronic records into the electronic records and document system.

Rendering: printing requirements are all achievable; however, they will require the organization to create a solution which is in many cases, depending on the business need, a simple task. For example, there is a requirement to allow the administrator to print any and all administrative parameters. Administrative parameters are available using the Microsoft 365 administrative consoles and PowerShell. Microsoft 365 is more than an EDRMS for many organizations,

including the primary communication and productivity applications used by end users. Printing all administrative parameters is not as simple as logging in to a configuration page and selecting print as it might be on a standalone EDRMS. However, a script or Power Automate flow can be built to export and format the required parameters for printing.

### Administer

A total of 26 out of 275 requirements are categorized in the Administer section, across four sub-categories. Functional requirements for the Administer section are designed to ensure that system administrators have the functional capability to manage the system to meet the organization’s records management needs while also providing the hands-on tools to execute administrative tasks without having to escalate outside of the team. The following chart shows the level to which each sub-category of requirements may be achieved using Microsoft 365 out-of-the-box capabilities, whether light customization is required or if a third-party add-on is needed.



The results of the evaluation found that 20 out of 26 requirements are fully supported by Microsoft 365 out-of-the-box features and configurations. However, three requirements are supported through a Microsoft 365 solution, and three requirements rely on a third-party add-on or workaround.

Reporting requirements are closely supported with minor Microsoft 365 solutions required. Regardless of out-of-the-box support for reporting, many organizations choose to enhance the existing capabilities through the use of Power BI, which provides reports with relevant information specific to their business needs and allows recipients and business users to analyze information without having to create

PivotTables. Backup and recovery requirements require a third-party service as the standard includes requirements for administrators to manage backup routines, media and location. As Microsoft 365 is a software-as-a-service (SaaS) solution, Microsoft performs and manages all system backups and restoring from backups if required. Microsoft invests heavily in data resilience, which includes redundant data operations and storage in geographically distanced data centers. Many organizations avoid procurement and management of third-party backup systems as Microsoft is able fulfill their enterprise requirements with minimal configuration.

# Detailed Evaluation of ICA Module 2 Functional Requirements in Microsoft 365

The tables below provide additional information within the ICA Module 2 to help organizations review in brief detail a summary for the requirement processes they are most interested in, either from the perspective of a demonstrated need for a specific group of requirements or to investigate possible approaches to enhance what is provided with Microsoft 365 to use SharePoint Online as their EDRMS.



- • • **Assessment of Microsoft 365 capabilities within the Create section**

Capture Processes (9 Requirements) – 89% Directly Supported by Microsoft 365			
	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	8	0	<p>SharePoint Online directly supports EDRMS requirements and provides unparalleled integration interoperability with applications used for the capture of records.</p> <p>Default controls exist to capture metadata on creation (e.g., date, time, author) as well as user-defined or contextual metadata (e.g., functional classification, security classification).</p> <p>Version management in conjunction with retention capabilities for the platform ensure all versions of records and their metadata are maintained and available to EDRMS administrators.</p> <p>Warnings can be configured for metadata to notify the end user when a record's metadata values are incomplete. In the event the EDRMS fails to successfully capture a record, the end user is notified directly through the SharePoint user interface.</p>
<b>M365 Solution Required (scripts or workflows)</b>	1	0	<p>SharePoint Online provides end-user notifications and alerts when an attempt to capture, store or create records results in incomplete or inconsistent content or missing metadata. However, additional alerts and reports may be generated for wider audiences or supervisors through automated workflows in the Power Platform.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

### Point of Capture Metadata (11 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	11	0	SharePoint Online directly supports requirements for point of capture metadata with standard out-of-the-box features including the use of persistent metadata for records, support for enterprise-wide centrally managed metadata, timestamps as part of all auditable activities, granular permissions management, and unique identifiers for records (e.g., Document ID service).
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

### Aggregation of Electronic Records (5 Requirements) – 80% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	3	1	SharePoint Online supports automatic definition of unique references for records, which allows for the reliable retrieval of a record no matter where it is stored or moved to. This is available through two out-of-the-box features: durable links and the Document ID service.
<b>M365 Solution Required (scripts or workflows)</b>	1	0	Ensuring that all records captured within SharePoint Online are associated within an aggregation can be accomplished through the use of simple automated workflows in the Power Platform and reporting.
<b>Third-Party Add-on or Workaround Required</b>	0	0	



## Bulk Importing (2 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	2	0	Bulk importing of records into SharePoint Online with their metadata is supported and can occur through a variety of tools provided by Microsoft. The platform also provides robust application programming interfaces (APIs) so that records exported from other systems may be directly captured in bulk.
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Electronic Document Formats (2 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	2	0	<p>SharePoint Online supports EDRMS requirements for the capture of records in native file formats including word processing, spreadsheets, presentations, emails, and simple databases and PDF files (including PDF/A).</p> <p>Microsoft 365 provides applications for end users to create, modify, access and maintain records in the file formats which are used by enterprise organizations (e.g., .docx, .xlsx, .pptx, etc.).</p> <p>SharePoint Online storage and Microsoft 365 records management capabilities are not dependent on file format. As a result, it supports the storage as well as records management capabilities for all document and file formats.</p> <p>Finally, SharePoint Online and Microsoft Search support the ability to extend search capabilities to new data formats through the use of Microsoft Graph connectors.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Compound Records (2 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	2	0	<p>SharePoint Online provides capabilities to easily capture and upload compound records into a single storage unit, such as a document set or folder. Through the use of Microsoft 365 retention labels, each component of a compound record may be managed as a record individually, or the compound record itself may be managed as a record.</p> <p>Other examples of compound records that are supported out-of-the-box are conversations and chats in Microsoft Teams. Each chat message in a conversation may be viewed as a component of a larger compound record (the conversation). Through the use of Microsoft 365 retention policies, the conversation itself may be managed as a record, with all of the messages within being components of that compound record.</p> <p>Similar to the bulk capture of records, SharePoint Online supports the capture of compound records in bulk through the use of tools available from Microsoft (SPMT, PowerShell).</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Email (6 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	6	0	<p>Requirements for the capture of emails are all directly supported in Microsoft 365. Users are able to capture emails, including both text and attachments, as single records as well as individually. Emails may be managed as records directly in Microsoft Outlook, or they may be easily transferred (through drag and drop) as files to SharePoint Online and managed as records.</p> <p>Microsoft 365 ensures that the transmission details of the email are captured and cannot be changed. Dependent on organizational requirements, records in SharePoint Online can be labeled such that they cannot be changed by users. As well, records may be labeled with a “Regulatory Label” which restricts any changes to the records, even from administrators.</p> <p>Additionally, organizations may benefit from an end user productivity and process adherence perspective through development of a solution to reduce the manual effort of capturing email records from their mail application (e.g., Outlook) into an EDRMS.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	



### Identification (7 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	6	1	<p>Requirements for unique identification of records are directly supported via SharePoint Online to provide unique identifiers to records and associated items (e.g., aggregates).</p> <p>Dependent on the item in question, Document ID or a GUID is available to provide a unique value for traceability and identification. Document IDs can be configured in terms of format for naming and numbering conventions.</p> <p>Durable Links are also available and unique to all records in SharePoint Online, allowing users to easily identify and retrieve records across the entire environment.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Establishing a Classification Scheme (13 Requirements) – 93% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	10	2	<p>ICA Module 2 requirements for establishing a classification scheme are directly supported through a robust set of features through the SharePoint Term Store. Managed Terms generally include the organizational classification scheme, represent aggregations (e.g., function, activity) in multiple levels, with the ability to apply inheritance, and include additional terms in a thesaurus.</p> <p>Classifications can be used for browsing repositories and searching/filtering records.</p> <p>Multiple classification schemes can be managed in the Term Store with the ability to administrate organizational changes over time, including the merging or deprecation of terms.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	1	<p>There is one “should” requirement provided in this section for the EDRMS to automatically generate a sequential number within the classification scheme for each new aggregation. If the numbering must be unique, and not sequential, the out-of-the-box SharePoint Online Document ID service can be used. However, in the event a sequential number is required, Power Automate can be used to produce the automatically generated sequential number for each aggregation.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Classification Levels (9 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	6	3	<p>SharePoint Online and Microsoft 365 support robust capabilities for defining and managing classification levels for information management, sensitivity and retention/records management. The SharePoint Online managed metadata service provides capabilities for both structural and hierarchical metadata taxonomies. SharePoint Online supports numerous standard metadata fields such as title. Any combination of metadata fields may be applied, either by users or by a records capture/import process.</p> <p>The SharePoint Online managed metadata service allows a classification scheme to be automatically constructed from a controlled vocabulary of terms from any data source through a simple import, including an ISO-compliant thesaurus. The resulting controlled vocabulary may be used as records management metadata and may be utilized as a naming mechanism for aggregations. These terms may also be utilized as information management metadata that is integrated with other business processes.</p> <p>The configuration and management of the classification scheme may be restricted to only authorized users, and different users may be given access to manage the classification scheme at different levels in its hierarchy. All modifications to the classification scheme are auditable, with numerous attributes of the modifications captured, including the date.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Classification Processes (15 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	15	0	<p>Once classified, SharePoint Online provides the flexibility for aggregations to be re-classified at any level in the classification scheme, and to restrict that capability to only authorized users. A clear and immutable history of all modifications to content and metadata is maintained so that the entire history of the record may be reviewed or audited.</p> <p>Microsoft 365 can prevent the deletion of records or aggregations at all times, with the exception of disposal approval processes which are defined and controlled by a disposal authority (record manager), by legal holds applied by authorized users or by an administrator. Reclassification of records is also permitted at a disposition phase in the records lifecycle, allowing authorized users to enter a reason for the reclassification.</p> <p>The opening or closing of a volume or aggregation may be managed through SharePoint Online metadata or information architecture, and any openings/closures are recorded in the system audit log for historical and audit purposes.</p> <p>The integrity of records and of the records management system is maintained at all times, regardless of maintenance activities or user actions.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Record Volumes (6 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	6	0	<p>A volume may be defined at numerous levels in the SharePoint Online information architecture, and the history of its opening or closure is recorded in the system audit log, along with the date and other attributes, for historical and audit purposes.</p> <p>When volumes are closed, by adjusting permissions on the volume, SharePoint Online will prevent users from adding new records to the volume. However, specifically authorized users may still add records if required. In this state, users may still view or access the records already in a volume if the user has permissions on the volume.</p> <p>Volumes may be opened and closed as needed by authorized users, depending on the organization's specific records management processes.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	





## Maintain

Managing authentic and reliable records

- • • Assessment of Microsoft 365 capabilities within the Maintain section

### Access and Security (3 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	3	0	<p>Access and security requirements state that records are maintained and complete and any changes to them must be documented.</p> <p>Retention policies and retention labels retain the history of all modifications to records through automated version control in SharePoint Online. A history of changes to the structure of a SharePoint site or metadata for records is maintained in the system audit log.</p> <p>Retention labels may be configured and applied to records such that records are maintained complete and unaltered. Special exceptions such as court orders requiring amendments to record content or metadata are supported by enabling an authorized user with sufficient permissions. The history of such modifications is maintained in the SharePoint version history and the system audit log.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

### Access Controls (1 Requirement) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	1	0	The requirement to restrict access to system functions according to the user's role and strict system administration controls is provided by Microsoft 365 at multiple levels, including: Microsoft 365 administration roles, compliance roles, and granular access in SharePoint Online to modify permission levels to provide access based on the principle of least privilege.
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

### Establishing Security Control (4 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	4	0	<p>Security control features in Microsoft 365 are implemented in direct correlation with requirements in the ICA Module 2 standard. Only administrators have the ability to create, configure and modify profiles and groups and allocate users to groups.</p> <p>Administrators may alter the security configuration of individual records if needed. This capability and the modification of all security attributes may be restricted to only authorized personnel if required.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Assigning Security Levels (6 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	6	0	<p>SharePoint Online and the Microsoft 365 platform provide the ability for granular assignment of security levels through permission levels, roles, and role groups to access SharePoint sites, libraries, folders and individual records. Only administrators are permitted to determine and configure features, records management metadata fields, records or aggregations to which a user has access.</p> <p>An administrator-controlled authentication mechanism is required to access the system and therefore records at all times. Access may be restricted to specific records or aggregations. A user's access may be restricted according to their security clearance using one of three available group mechanisms to assign access (AD groups, Microsoft 365 groups or SharePoint Online groups). Access may be restricted to particular features as well (e.g., read, updated, delete specific files). These same control functions may be applied to users or roles, through the user or groups.</p> <p>Additional security levels may be applied in addition to standard controls, including sensitivity labels which can apply encryption/access at the record level. Sensitivity labels may be used to deny access to records after a specified date or time period.</p> <p>Full flexibility is provided for administrators to manage group membership and limit user, group or role access to administrative functions, volumes, aggregations or records.</p>
<b>M365 Solution Required (scripts or workflows)</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Executing Security Controls (6 Requirements) – 83% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	5	0	<p>Security control requirements align directory to out-of-the-box controls in Microsoft 365.</p> <p>SharePoint Online allows an administrator to alter security categories on some or all records within an aggregation, or on the aggregation itself through either the modification of metadata or the controlled vocabulary terms in the managed metadata service, or through the configuration of SharePoint permissions.</p> <p>All changes and activities performed by administrators are recorded in the system audit log for historical and audit purposes. All access attempts performed by users are also logged in the system audit log for the same purposes.</p> <p>When searching, records are never included to which the user does not have permissions or rights to access.</p> <p>Security classification for records may be modified by authorized individuals with the option to prompt for confirmation and require a written justification which is logged and auditable. Dependent on the configuration of SharePoint Online sites and their associated access controls, unauthorized end users may be restricted from seeing the record and metadata (e.g., classification) or they may be restricted from seeing any evidence of the record itself. Activities in Microsoft 365 are logged and auditable, including attempts to access records, for both authorized and unauthorized users.</p>
<b>Planning or Solutioning Required</b>	1	0	<p>Upon searching for records, the display of search results may be configured in Microsoft Search and SharePoint Online to display results in a flexible manner to the end user, including displaying titles and records management metadata, and/or the file or record number.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Security Categories (10 Requirements) – 90% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	9	0	<p>Microsoft 365 provides the ability to assign security classification to records through Microsoft Purview Information Protection and sensitivity labels; for example, differentiating between unclassified, Protected A, etc., by using sensitivity labels can allow access-permission security categorization by roles or levels, or through any combination supported through creation of groups as per the standard.</p> <p>Additionally, as required, sensitivity labels can automatically apply a default (e.g., unclassified) to a record, have the system determine and apply the highest sensitivity level to a record, restrict access to records to unauthorized end users based on the classification, and support scheduled reviews of the security classifications.</p>
<b>Planning or Solutioning Required</b>	1	0	<p>Through the user of automated workflows, the security classification of aggregations can be controlled and prevented from having a lower security classification than any record within an aggregation.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Records Management Process Metadata (13 Requirements) – 92% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	12	0	<p>Record management process metadata in Microsoft 365 and SharePoint are captured through the system audit log, which is a clear and immutable history of all activities in this system performed by both administrators and users. The system audit log meets all requirements in the standard related to capturing activities and capturing properties related to activities, including date, time, reclassifications, modifications, transfers, disposals, permission assignments, group assignments, etc.</p> <p>The system audit log in Microsoft 365 fulfills requirements to track and store activity for metadata, including all changes to metadata at the record level (e.g., changes to a classification value on a document) and changes to metadata itself (e.g., changes to existing classification schema). As per the standard, metadata can be extracted with and without records.</p>
<b>Planning or Solutioning Required</b>	1	0	<p>The Microsoft 365 system audit log retains process metadata (activities and related properties) for 90 days or one year depending on the enterprise license assigned to the user.</p> <p>Microsoft 365 has built-in capabilities to retain the system audit log data for up to 10 years when using the advanced audit log feature, which requires an additional license.</p> <p>Retaining system audit log data for additional time beyond 10 years requires the use of other Microsoft Cloud technologies in Azure, such as Azure Sentinel, Azure SQL and/or Azure Data Lake. Licenses for these solutions are consumption-based and are required to leverage them.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Tracking Record Movement (3 Requirements) – 67% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	2	0	<p>SharePoint Online records the movement and locations of all records in the system in the Microsoft 365 system audit log. A history of activities such as uploading or creating a record, moving a record, or downloading a record are all maintained in the system audit log with data such as dates, times, user responsible, locations, etc.</p> <p>Records in Microsoft 365 can be maintained and rendered through software advancements over time. Microsoft has provided backwards compatibility for its products and older file formats, including non-Microsoft formats. In addition, Microsoft Office applications provide an extensible platform to support opening and rendering non-Microsoft or legacy file formats through the use of iFilters. A unique Document ID may be assigned automatically to all records through the Document ID services which is configured at the SharePoint Online site level.</p>
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	1	0	<p>Microsoft 365 does not natively support the tracking of non-electronic records (e.g., paper records). Organizations which require the inclusion of non-electronic records in their EDRMS are able to leverage features included in Microsoft 365 licensing primarily using SharePoint Online and the Power Platform. This will require detailed planning of the solution architecture and information workflows to provide consistent use and management of electronic and non-electronic records.</p>



**Maintain**  
*Hybrid records management*

**Management of Electronic and Non-electronic Records (10 Requirements) – 0% Directly Supported by Microsoft 365**

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	0	0	
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	8	2	<p>Although the Microsoft 365 and SharePoint Online platforms provide robust capabilities for electronic records management which meet the majority of the requirements in this standard, they do not provide capabilities to manage non-electronic records (e.g., paper records).</p> <p>The management of physical or non-electronic records is becoming less and less of a requirement, as more and more content is created in an electronic medium. In addition, many organizations are striving to establish a paperless office with digital signatures and the scanning of existing paper records to electronic formats. Finally, governmental organizations are adopting directives which require that their agencies eliminate paper and use electronic recordkeeping practices moving forward (e.g., U.S. White House Memorandum <a href="#">M-12-18</a>); this is resulting in fewer paper records to manage. Over time, this direction will lessen the need for a requirement and solution to manage non-electronic records.</p> <p>Organizations which do require tracking of non-electronic or physical records may procure a third-party tool or develop an in-house solution within Microsoft 365 to fulfill this requirement. Once a SharePoint Online solution has had the appropriate features deployed in a tenant, this sub-category's specific requirements may be met.</p>





## Maintain Retention and disposal

### Disposition Authorities (32 Requirements) – 72% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	22	1	<p>Disposition of records from SharePoint Online is robust and allows organizations to effectively manage them, with the majority of stated requirements from ICA Module 2. Each retention label in the Compliance Center can be configured to: initiate and automate disposition reviews upon completion of the retention duration; allow for disposition authorities to either approve disposal, relabel the record or extend retention to a future date; or initiate retention based on when a record was created or finalized or based on a specific event.</p> <p>Advanced eDiscovery allows organizations to meet legal hold requirements as stated in the standard, which can retain records and restrict disposition on specific records in the event of a legal hold, until it is released.</p> <p>As per the standard, changes to retention labels (and their disposition reviewers) are through a privileged administrative role. Disposition activities are logged in the audit log and available for organizations to export and maintain as required.</p>
<b>Planning or Solutioning Required</b>	7	0	<p>A majority of report requirements for disposition authorities and their activities can be met through the use of PowerShell and Power Automate. Access as described can be provided for oversight through read only roles to the Compliance Center. ICA Module 2 also includes a requirement for delivered reports which must be scripted using the Office 365 Management Activity API.</p> <p>Power Automate integration is expected for general availability in September 2022, which will provide organizations an out-of-the-box experience to create automated and standardized disposition reports.</p>

<b>Third-Party Add-on or Workaround Required</b>	2	0	<p>The standard requires the ability to specify the frequency of a disposal authority report and highlight exceptions such as overdue disposal. The out-of-the-box frequency for disposal is set on a weekly basis and cannot be customized. Disposition authorities and administrators can, however, access the Compliance Center for information or to action disposition at any time; they do not require a scheduled prompt to review disposition.</p> <p>The standard also requires the ability to provide multiple reporting and analytics tools based on disposition, including the ability to compare and review disposal authorities.</p> <p>Where applicable, specific reporting and analytics functionality for disposition authorities would require a solution leveraging information available from the Compliance Center.</p>
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**Migration, Export and Destruction (14 Requirements) – 86% Directly Supported by Microsoft 365**

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	9	3	<p>SharePoint Online provides organizations the ability to migrate/ transfer records to another system, tenant or third-party solution.</p> <p>The ICA Module 2 standard requires that exports provide a well-managed process to transfer records to another system or third-party organization and support migration processes. Microsoft 365 and SharePoint Online provide organizations multiple methods and tools for exporting information for the purposes of migration to other SharePoint Online sites, file repositories or network shares, as well as external organizations using systems which are not based on Microsoft 365. Transfer or migration requirements have historically been met through using the SharePoint Migration Tool (SPMT) or custom scripts. An upcoming update will allow the use of Power Automate to provide in-line capabilities for fulfilling transfer and migration requirements – for example, for archiving files to another organization at the end of their retention period.</p> <p>The ICA Module 2 also requires search and export of data aggregates. The Microsoft Advanced eDiscovery workload enables search and export capabilities which are designed to search over a larger series of sites (including the entire tenant) and return relevant information.</p>

<b>Planning or Solutioning Required</b>	1	0	<p>A requirement within the standard is identified to have the ability to retain records management metadata for records and aggregated records which have been destroyed, transferred or migrated offline. Dependent on the Enterprise license, Microsoft 365 can retain SharePoint logs for a period of 10 years.</p> <p>Records management metadata is required to be stored in a location outside of the Microsoft 365 audit log. Multiple opportunities are available which can be decided based on the scope of the number of files, amount of metadata and duration over which they must be kept. Where this requirement is for a limited number of records, a SharePoint list can be used. Where the scope increases to an enterprise solution, Azure services such as Azure Databricks and Azure Data Lake may be required with an additional procurement.</p>
<b>Third-Party Add-on or Workaround Required</b>	1	0	<p>A requirement is included in this category for the allocation and disposition of hybrid/non-electronic records. Non-electronic records do not immediately support the required business processes; therefore, this functionally must be developed as part of a non-electronic records solution if required.</p>

### Retention and Disposal of Electronic and Non-electronic Records (9 Requirements) – 0% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	0	0	
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	8	1	<p>The SharePoint Online platform is customizable and interoperable with other applications within Microsoft 365. Organizations have the ability to leverage SharePoint Online features and develop solutions on top of SharePoint sites to provide the specific needs of their organization. Detailed and automated workflows can be used to capture and process all the required information within a series of business processes.</p> <p>In order to enable the use and manage both electronic and non-electronic records (e.g., physical objects) within SharePoint Online, an organization must either procure a SharePoint Online add-on or develop a solution which extends SharePoint Online.</p> <p>The Power Platform, specifically Power Apps and Power Automate, provides enterprise customers the ability to rapidly prototype solutions such as a tool for managing non-electronic records within Microsoft 365.</p>



- • • Assessment of Microsoft 365 capabilities within the Disseminate section

### Search, Retrieve and Render (27 Requirements) – 78% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	19	2	<p>SharePoint Online provides an accessible search, which is integrated throughout the Microsoft 365 ecosystem. Search in SharePoint Online adheres to key EDRMS requirements from the ICA Module 2 standard. End users are able to search on a flexible range of functions that will include results from the record’s metadata, and for standard file format records, the file content itself. Search capabilities enable users within the organization to use free text for searching as well as filtering based on metadata and classification.</p> <p>The search capabilities of SharePoint Online provide unmatched ability to execute search not only from the EDRMS interface itself (SharePoint Online), but also from the end user applications themselves, such as Microsoft Word, Microsoft Teams or the Office Portal.</p> <p>Aggregate records can be searched through the use of metadata and information architecture which are unique to every organization.</p> <p>Search results are optimized for relevance through crawling all repositories, but security trimming what is provided to end users to provide only what they have access to.</p> <p>Additionally, search terms using the NEAR operator can specify the proximity between two words, directly supporting a vast majority of search requirements – for example, to return search results of all files with the word “project” and “charter” within 50 characters of each other.</p>
<b>Planning or Solutioning Required</b>	0	3	<p>SharePoint Online partially supports some of the search, retrieve and render requirements through supporting a portion of the three “should” requirements and requiring additional custom workflows or script execution to merge information into a single source to display results which are required as per the ICA Module 2.</p> <p>An EDRMS is also required to rank and display the ranking of files on search results. SharePoint Online will as a normal activity rank results by their relevance. SharePoint Online out-of-the-box, however, will not include the rank number on results, even when sorted by relevance. A custom search results page can be developed to include such a number.</p>

<b>Third-Party Add-on or Workaround Required</b>	2	1	Requirements in the standard for search, retrieve and disseminate include searching for both electronic and non-electronic aggregations. Non-electronic records, also known as physical records, are not available immediately in SharePoint Online, but they can be supported provided the organization has invested in establishing a physical records component to its SharePoint Online-based EDRMS.
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### Rendering: Displaying Records (3 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	1	2	SharePoint Online provides the ability to render or display all records which a search request has retrieved. In the event the record was in a standard-supported format, SharePoint Online is able to render the record without the use of an additional application.
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Rendering: Printing (13 Requirements) — 0% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	0	0	
<b>Planning or Solutioning Required</b>	11	1	<p>Printing requirements are primarily not directly supported on a default initial deployment of Microsoft 365 and SharePoint Online due to the capabilities and utilization as an enterprise tool.</p> <p>Printing requirements in the ICA Module 2 standard include multiple instances where information for a record must be printed as part of the file metadata. In a standalone EDRMS, the disposition authority may be a record level row; in Microsoft 365, disposition authority is directly associated with the retention label. The retention label can be exported or printed as part of the metadata of a file; the disposition authority, however, is not immediately available. A custom export or formatting for printing workflow must be developed to include the disposition authority as a result of the retention label.</p> <p>Ensuring adherence to printing requirements is achievable using the applications and tools available to Microsoft 365 end users provided specific business needs can be identified for their implementation.</p>
<b>Third-Party Add-on or Workaround Required</b>	1	0	<p>ICA Module 2 includes a “must” requirement for users to print the results list from all searches. This is not a supported feature inside of SharePoint Online. Organizations which require this functionality will require a custom development for retaining and allowing the printing of historical search results in a print-friendly format. End users are able to print search results as they would any other web page at the time of their search.</p>

## Rendering: Redacting Records (6 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	3	3	<p>Records in SharePoint Online may be extracted or redacted, with activities logged through existing metadata (e.g., date, time, modified by) and custom metadata (e.g., justification).</p> <p>Versioning in SharePoint stores all versions of a record, and the audit log maintains a history of transactions for a record.</p> <p>Extracted records can have information replaced to ensure it is not accessible, including in the event of the receiver attempting to hide layers, rotate the on-screen record elements, or other such activities.</p>
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Rendering: Other (1 Requirement) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	1	0	SharePoint Online has the ability to render not only Microsoft Office documents (e.g., Word, Excel, etc.), but also files using other standard formats (e.g., .pdf, .png, .jpg, .txt, .csv, .json).
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Rendering: Repurposing Content (1 Requirement) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	1	0	<p>SharePoint Online provides the ability to reuse and repurpose content in a variety of ways, including dynamic links to content.</p> <p>An unparalleled strength of the Microsoft 365 platform is the amount of integration and interoperability within the platform between applications (e.g., Word, Excel, Outlook) and different workloads (e.g., SharePoint, OneDrive, Teams, Power BI, etc.).</p>
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	





- • • Assessment of Microsoft 365 capabilities within the Administer section

**Administrator Functions (8 Requirements) — 100% Directly Supported by Microsoft 365**

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	8	0	<p>SharePoint Online has multiple use cases, including serving as the EDRMS of an organization. It has extensive administrative functions and directly supports all administrative capabilities stated in the ICA Module 2 standard.</p> <p>Additionally, many administrative tasks can be scripted by administrators to more efficiently meet the organization’s specific needs on an ongoing basis.</p> <p>Microsoft 365 provides multiple administrative centers to support separation of roles and responsibility, including administrative consoles specifically for SharePoint, Compliance, Security and Microsoft 365 which includes licensing and access control management.</p>
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Metadata Administration (4 Requirements) – 100% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	4	0	SharePoint Online has mature and robust features for metadata implementation, management and administration. Metadata can be developed for use across the enterprise or for localized sections of the EDRMS. Administrative capabilities of metadata include granular role-based management and tracking of administrative activities via the Microsoft 365 Audit Log. Metadata schema and status can be modified by administrators, including the ability to rename terms, provide aliases, merge terms and deprecate terms to avoid future use.
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Reporting (8 Requirements) – 63% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	5	0	Reporting capabilities for Microsoft 365 are robust and provide the organization a variety of opportunities to deploy a custom report structure and schedules with the ability for rich dashboards. Using Power BI, Microsoft 365 end users can collect, synthesize and disseminate business intelligence with a modern interactive experience. Microsoft 365 Enterprise licensing includes out-of-the-box utilization reports and allows organizations to customize or enhance them to fulfill their specific requirements.
<b>Planning or Solutioning Required</b>	3	0	<p>Reporting requirements will be specific to each individual organization as they relate to the source of the information, the metadata involved, as well as the metrics required for analysis.</p> <p>Microsoft 365 provides multiple options to allow subject-matter experts to extract data, transform it into the required format, and either export reports or provide dashboards for interactive data analysis.</p> <p>Tools to develop or expand reports are readily available using resources available with Microsoft 365 licensing, including the use of Power BI and Power Automate.</p> <p>In some cases, dependent on the complexity and business requirements, additional workloads such as Logic Apps and data management solutions (e.g., Azure Data Lakes, Azure Data Warehouse) may be required.</p>
<b>Third-Party Add-on or Workaround Required</b>	0	0	

## Backup and Recovery (6 Requirements) – 50% Directly Supported by Microsoft 365

	Must	Should	Evaluation Summary
<b>Directly Supported by Microsoft 365</b>	3	0	Microsoft 365 provides multiple levels of automated backups of records in SharePoint Online. This includes two stages of recycle bins and daily backups. These backups are enhanced through the use of information governance and records management capabilities within the Compliance Center, which allow organizations to specify how long information must be retained, including copies of all versions.
<b>Planning or Solutioning Required</b>	0	0	
<b>Third-Party Add-on or Workaround Required</b>	3	0	<p>Backup and recovery requirements require an add-on or workaround as the ICA Module 2 specifically includes requirements for administrators to manage backup routines, media and location. As Microsoft 365 is a software-as-a-service (SaaS) solution, Microsoft executes and manages all system backups with the ability for data to be restored as required.</p> <p>Microsoft 365 takes a modern approach to ensuring the organization has backups of records with minimal requirements on management. ICA Module 2 has listed specific requirements for the administrator to create and manage backup frequency, media, etc. Microsoft provides a platform with data redundancy in their data centers, ensuring the records exist in more than one location. Retention policies, retention labels and retention label policies ensure that all records and versions of records, inclusive of items in SharePoint lists and document libraries, are retained and accessible for their lifecycle, regardless of their state. For example, a file can be retained based on its retention schedule of 10 years even after an end user has deleted the file.</p> <p>Should there be a need to create a customized backup system to provide data resiliency above and beyond what Microsoft provides, organizations may procure any one of many third-party systems to use native tools available to Microsoft 365 users, such as PowerShell, to extract information as backups.</p> <p>A third-party backup system would be required for any cloud-based or on-premises solution.</p>

# Conclusion and Looking Ahead

In summary, out of the 275 requirements included in the ICA Module 2 standard for establishing an effective EDRMS system, our evaluation found that Microsoft 365 allows organizations to meet 217 requirements (79%) through out-of-the-box features and configurations, 34 requirements (12%) using Microsoft 365 solutions that require additional configuration or light customization (workflows, web apps or scripts), and 24 requirements (9%) through a third-party add-on or workaround.

Microsoft 365 and SharePoint Online provide a mature and modern platform for organizations to use as their primary EDRMS while supporting complex requirements from standards such as ICA Module 2. Effective configuration and rollout of the out-of-the-box features of these platforms requires meaningful planning, a focus on information architecture design, a robust organizational change management plan, and in-depth knowledge of Microsoft 365 and SharePoint Online features. The out-of-the-box features that enable these configurations are available with Microsoft enterprise licensing; however, understanding the differences between the levels of enterprise licensing (e.g., E3 vs. E5 licenses) will be beneficial to ensuring the correct licensing is in place.

Microsoft 365 solutions to fulfill those 34 requirements where needed (out of the 275 referenced above) require further knowledge of how to implement light customizations in SharePoint Online, how to leverage the Power Platform for apps and automated workflows, and at times how to build and run PowerShell scripts to gather data; all of these capabilities are available within the Microsoft 365 platform. Additional work is typically required to plan, build and deploy those solutions. Additionally, understanding if additional Microsoft licenses are required (depending on the design of the solution) will be beneficial.

Organizations can move forward with deploying, configuring and utilizing Microsoft 365 and SharePoint Online as a future-ready EDRMS platform which helps them meet ICA Module 2 requirements.

Looking ahead, ICA Module 2 was published in 2008, and since then the tools that organizations use for collaboration, information sharing and document management have evolved greatly. Cloud-based software-as-a-service applications are now the dominant solution for information management. Methods of communication and information sharing are moving away from email and email attachments, and more toward instant messaging, file sharing and online video meetings through tools like Microsoft Teams. These trends are creating new types of data that we must consider in our records management strategies. As well, there has been a growing trend moving away from paper/physical records, with directives being issued by high-profile government organizations (e.g., U.S. White House Memorandum [M-12-18](#)). As a result, our records management strategies, and the standards we adhere to, must evolve and adopt these new methods of working as standard practices that produce records that must be managed.

ICA-Req and ICA Module 2 have recently evolved into the new ISO standard, ISO 16175-1:2020, which was published in July 2020. Organizations are encouraged to move from ICA Module 2 and toward adoption of ISO 16175-1:2020 as the new standard for implementation of an effective EDRMS platform. Microsoft 365 has already incorporated ISO 16175-1:2020 as a template in the Microsoft Compliance Manager (available in Microsoft 365 through the Microsoft Compliance Center page); the Microsoft Compliance Center and this template allow organizations to self-audit their adherence to this standard and to understand in-depth the controls that Microsoft has implemented to align with ISO 16175-1:2020.

Migration to the Microsoft 365 platform allows organizations to modernize their information management systems while fulfilling a variety of records management requirements and legal obligations. It provides organizations with a long-term solution, which will continuously evolve to support their ongoing enterprise information management needs.

## ABOUT PROTIVITI

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