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**Subject: Management of University Records**

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## **1. Purpose**

This policy provides guidance in establishing and maintaining a records management program. Records Management is an administrative technique that provides management and control over the files and records of the university to enhance efficiency and effectiveness. It includes activities associated with the creation, movement, retention, retrieval, duplication, safekeeping, and destruction of records.

### **1.1 Background**

The Virginia Public Records Act, Chapter 7 of the *Code of Virginia*, vests the records management function of state and local government in the State Library Board. This act authorizes the State Library Board to regulate and manage the preservation, filing, reformatting, and destruction of public records of all agencies. The *Code of Virginia* requires all state agencies with public records to have a records management program.

## **2. Policy**

At Virginia Tech, the University Records Manager is responsible for compliance with the Virginia Public Records Act and is the liaison officer with the State Library of Virginia. The University Records Manager develops and implements university policy and procedures for the university-wide records management program in accordance with the guidelines of the Virginia Public Records Act. All organizational components of the university are required to participate in this program. The Dean, Director, or Department Head is responsible for all university records generated and received by the unit.

University records are the property of the university. Administrators, faculty, staff, and students who terminate their association with the university are to return all university records to the appropriate office. University personnel are responsible for assuring compliance with state and federal statutes pertaining to the confidentiality of university records.

Those items designated as non-university records will not be subject to the university's records management program. When there is any doubt as to whether or not an item is a non-university record, it will be considered to be a university record.

This policy governs only those records originally created by Virginia Tech. When a record is created, one version of the document (whether the signed version, a copy, or the electronic version) will be designated by the originating office as the “official version”. This official version is the only one that is maintained in accordance with the records management procedures in this policy. All additional copies of the official version can be retained as long as needed and then disposed of as desired.

## 2.1 Roles and Responsibilities

The university’s records management program is vested in the University Records and Information Governance (URIG) office of University Libraries. URIG accommodates the record-keeping needs of the university by providing consulting and support services for the efficient and economical management of university records, based on their administrative, legal, fiscal, and historical value. URIG provides advice and assistance in the areas of:

- Records retention
- Records storage
- Records destruction
- Advising on reformatting services
- Assistance in vital records storage and retention

At this time, there are no fees for these services.

URIG operates the Records Center within the University Storage Facility, a warehouse specifically designed for inexpensive storage of records. Records stored in the center are incorporated in the state retention schedule. Records eligible for storage in the center are inactive records; those normally referenced less than 10 times annually, which are stored for administrative, regulatory, and legal retention requirements. These records have a short-term retention period, on average 3-5 years until their destruction date. Records will be stored on a first-come, first-served basis. If the facility is full, requests for storage will be placed in a queue until space is made available through a scheduled destruction.

Since the staff of URIG serves only as custodians of records, control of records stored in the Records Center remains with the originating unit, which establishes and maintains the schedule with the assistance of the University Records Manager. Exceptions occur to meet the university’s legal obligations or for auditing purposes.

The Dean, Director, or Department Head is responsible for all university records generated and received by the unit and has the authority to sign any and all memoranda relating to the retention schedule, storage, transfer, retrieval, and destruction of the records of the unit. Additionally, he or she would find it beneficial to appoint a Records Coordinator to act as his or her official representative. The Records Coordinator is the liaison between the department and URIG and is responsible for the records management activities of the department to include:

- Records inventory
- Coordination of the transfer and destruction of records
- Maintenance of an index or detailed listing of records stored in the Records Center within the University Storage Facility for reference by persons requesting records
- Additional duties related to records management.

Notify the University Records Manager of the identity of the Records Coordinator by completing and sending Records management Services the form “ Appointment of Records Coordinator”, located at the URIG web-site [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig).

## 2.2 Records Retention and Disposition

Retention and disposition periods are set by the State Library of Virginia for state agencies. These schedules, as well as an abbreviated Virginia Tech schedule, may be accessed at the University Records and Information Governance web site: [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig). It is the responsibility of the unit officials, with the assistance of the University Records Manager, to ensure that the retention and disposition schedules are being followed. These retention schedules are identified by type of record and numerical code and are normally based on fiscal, academic, or calendar year.

## 2.3 Legal Matters, Audits, and Investigations

Any university record that is relevant to pending or anticipated action, i.e., litigation, claim, audit, agency charge, investigation, or enforcement action, shall be retained until final resolution of the matter. In these circumstances, the university functional unit involved with the ongoing action will notify all other relevant functional units and work with staff to identify and retain any records (including electronic records) and other information that could be relevant to the matter. This will include a directive that the relevant functional unit’s normal document destruction procedures be suspended temporarily.

## 2.4 Electronic Records

The *Virginia Public Records Act* (§ 42.1-77) broadly defines an electronic as meaning a record whose creation, storage, and access require the use of an automated system or device. Ownership of hardware, software, or media used has no determination on whether a record is public. The great majority of electronic records, including E- mail, may be classified by their content, i.e.: “agenda files”, “management reports”, “budget records”, as the electronic system is merely a vehicle for such records. Records in E-mail systems include not only the messages sent and received, but also the transmission and receipt data. Electronic records may be encrypted with the approval of the Dean, Director, or Department Head, provided a clear, workable decryption device is kept available.

## 3. Procedures

Each unit of the university, in cooperation with the University Records Manager, can promote sound records management by complying with the following:

- Identify the persons responsible for records keeping.
- Comply with established retention schedules provided by the Library of Virginia.
- Transfer inactive records to the Records Center or dispose of the records as delineated in the retention schedule.
- Consult with the University Records Manager on vital records and microfilm systems and equipment.

### 3.1 Requesting Records or Information

The Dean, Director, or Department Head has access to all of the unit's records stored in the Records Center. He or she can authorize certain departmental personnel to retrieve information from records stored in the facility. When it is determined that a file, a copy, or information is needed from the boxes in storage, a telephone request can be made or an electronic or written request may be submitted on a "Records Management Service Request" form located on the University Records and Information Governance web site: [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig).

It is the unit's responsibility to return records promptly after use. Records not returned within 60 days will be assumed to have been permanently retained by the unit. Unit personnel will be asked to sign a receipt for all records or information regardless of format.

### 3.2 Authorizing Personnel to Request Records

Control of the records stored in the Records Center remains with the originating unit. ONLY authorized personnel from the department that stored the records are eligible to request the records or information from the records. The personnel authorized to request the records will be eligible to have access to all the records unless otherwise specified. To designate departmental personnel as eligible to secure information from stored records, complete an "Authorizing Personnel to Request Records" form at the University Records and Information Governance web site: [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig), and e-mail or send to the University Records Manager (postal code 0522).

Federal, state, and internal auditors have unrestricted and unlimited access to all university records. The only other exception to the rules of access is to meet the legal obligations of the university.

### 3.3 Transfer of Records

Transfer of inactive records to the Records Center at the University Storage Facility is accomplished by filling out the "Transfer of University Records" form located at the University Records and Information Governance web site: [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig). The form contains the department box number, record series retention code from the Schedule (see para. 3.1 above), title and date of the record, and the name of the first and last file of the box, if pertinent. Boxes must contain records from the same year and possess the same retention code.

### 3.4 Destroying Records

The state-approved "Certificate of Records Destruction" form is the university's authority to dispose of records according to the applicable retention schedule which is available as an electronic form on the University Records and Information Governance (URIG) web site: [www.lib.vt.edu/urig](http://www.lib.vt.edu/urig).

The Certificate of Records Destruction must be signed by the Dean, Division, Department Head or Records Coordinator and contains the record series numbers for the records to be destroyed. These can be obtained from the General Schedules posted on the URIG web site. The form should also contain the record title, date range, and number of boxes to be shredded or recycled. Upon receipt of the form, the University Records Manager will sign the form and return a copy to the department.

If the department wishes URIG to shred the records, it indicates that request at the bottom of the form. URIG will then issue labels to be placed on the boxes by the department. The department has the option of having Moving & Hauling deliver, or delivering the boxes themselves, to the Records Center for shredding.

**University records (official version) may not be destroyed without a certificate.**

**ALL Confidential records (containing social security numbers and/or ID numbers, or sensitive information) must be destroyed by shredding to include all copies.**

**Non-university record materials** containing no Sensitive or Confidential records may be disposed of by any convenient and economical means.

**Electronic Records** are not destroyed when sent to the trash or recycle bins on the computer. Electronic records must be electronically “wiped” clean or the media physically destroyed by burning, cutting or “chopping-up” of disks. Computer users should be cognizant of the fact that their hard drives may contain records/partial records, which may be electronically retrievable despite having “over-written” the drive. If an electronic document and its associated metadata are migrated to paper, the paper document becomes the official version. Note that attachments to the e-mail (if any) may be preserved elsewhere and need to be migrated as well.

## **4. Definitions**

**University records** are public records, originated within the university (copies of origin), and are defined as all written books, papers, letters, documents, photographs, tapes, microfiche, microfilm, photostats, sound recordings, maps, other documentary materials or information in any recording medium regardless of physical form or characteristics, including data processing devices and computers, made or received in pursuance of law or in connection with the transaction of university business.

**Non-university record materials**, meaning reference books and exhibit materials acquired and preserved solely for reference use or exhibition purposes; copies of records; extra copies of documents preserved only for convenience or reference; stocks of publications; transitional correspondence or memoranda including telephone call slips, letters of transmittal, and preliminary drafts of letters, working papers, memoranda, or reports; and private documentation, including e-mail, of a university staff member not generated from the transaction of university business are not included within the definition of university records.

**Sensitive Records** are originals as well as copies of records which contain social security numbers and/or ID numbers and require shredding for destruction.

**Confidential records** are those which contain private and privileged information as defined in university policy and state and federal regulations, such as the “Freedom of Information Act” (*Code of Virginia* 2.1-340) and “Privacy Protection Act” (*Code of Virginia* 2.1-377). These records are prohibited from public disclosure because access of information may cause harm or embarrassment to the state, its citizens, or other individuals or organizations. Therefore, special protection against unauthorized access should be given to confidential records. Extra measures can include storing records in double-locked filing cabinets or in restricted areas. Shredding is required for destruction of Confidential records.

**Vital records** are records essential to the continuing operation, recovery capability, and protection of university interests in a legal or fiscal position, in an emergency, or after a disaster. Vital records may or may not be confidential. Vital records include student records, faculty and staff records, certain financial and legal records, academic programs, etc. To ensure maximum protection of a vital record, one copy should be maintained at the unit of use, and another copy maintained at the off-site Records Center in the University Storage Facility.

**Active records** are records needed to conduct the daily business of the university. They must be maintained in appropriate filing or retrieval equipment for immediate access in the office.

**Inactive records** are records not required for immediate access, but retained for information, audit, or legal reasons. Normally they are referenced less than 10 times annually. They should be retired from expensive office space to off-site storage in the Records Center in the University Storage Facility.

**Electronic records** are public records whose creation, storage, and access require use of an automated system or device. Ownership of the hardware, software, or media used has no bearing on whether a record is public.

**Conversion** is the act of moving electronic records to a different format, especially from obsolete to a current format.

**Metadata** is data describing the content and structure of records and their management through time.

**Migration** is the act of moving electronic records from one information system to another to ensure confirmed access while maintaining the records' integrity, authenticity, reliability, and usability.

**Original record** is the first and preferred generation of the record.

## **5. References**

[\*Code of Virginia, Chapter 7, Virginia Public Records Act\*](#), 1976 and as amended.

[\*Virginia Public Records Management Manual\*](#), The Library of Virginia, September 2010 and as amended.

[\*Policy 7100, Administrative Data Management and Access Policy\*](#).

## **6. Approval and Revisions**

Approved February 20, 1989, by the Assistant Vice President for Administrative Affairs, Ann Spencer.

- Revision 1

Section 2. The agency records administrator is the university Records Manager. Deleted "the chief administrative officer of each unit is responsible for all university records generated and received by each unit." Deleted Sections 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7. Added Section 2.1, Record Retention, and Section 2.2, Disposal of University Records.

Section 3. Changed to list services provided. Deleted Sections 3.1, 3.2, 3.3, 3.4, 3.5. Added Sections 3.1 Records Storage, 3.2 Off-site Storage of Computer Tapes, 3.3 Requesting Records Information.

Section 4. Definition of "university records" changed to "original university records" and added "...records that are created by university employees." Deleted definitions of routine records, current records, semicurrent records, noncurrent records, custodian, and electronic records.

Section 5. Deleted references "Manual for the Management of University Records" and "Policy 2005."

Approved February 18, 1999 by Executive Vice President, Minnis E. Ridenour.

- Revision 2

General: Update to latest titles for individuals and offices (throughout the document). Update to reflect latest State Library guidance including elimination of several procedures. Add electronic records information. Add the Records Management web-site use throughout the policy, as that is the primary means of communication. Eliminate excess verbiage throughout; includes eliminating discussions not germane to this policy.

Section 2. Update to current titles. Section 2.1 altered to include current electronic records guidance. Deleted Section 2.2: Special Protection. Section 2.3 changed to 2.2 with current title: Records Management Services. Last two paragraphs eliminated. Eliminated COM service. Eliminated Archive discussion. Combined Section 2.5 and 2.6 into more concise, new Section 2.4: Requesting Records or Information. Shortened Section 2.7: Authorization into new Section 2.5, adding current usage of the Records Management web site.

Section 3. Eliminated outdated procedures. Sections 3.1 and 3.2 eliminated to reflect current State Library guidance. Section 3.3 eliminated to reflect current guidance. Section 3.4: Maintaining Schedules becomes new Section 3.1. Add a new Section 3.2: Transfer of Records. Add current web-site procedures. Section 3.5: Destroying Records becomes Section 3.3. Verbiage is reduced and web-site usage is introduced.

Section 4. Shortened to reflect current Library guidance and terms.

Section 5. References are updated.

Approved June 28, 2001 by Executive Vice President and Chief Operating Officer, Minnis. E. Ridenour

September 7, 2006: Technical revision – reference to former Policy 2005 updated to reference current Policy number 7100: Administrative Data Management and Access Policy.

- Revision 3  
General: Updates reflect the emphasis on electronic records contained in the 2006 changes to the Virginia Public Records Act; adds the term and student ID Number, which replaces the student Social Security Number on most student records; and adds definitions used in describing electronic records.

Section 2.1 adds current electronic records definition.

Section 3.1 adds disposition schedules to the discussion of retention schedules.

Section 3.3 enhances the discussion of disposition and migration of electronic records. Updates Section 3.3, Destroying Records, to reflect the Certificate of Records Destruction, Form RM3#, previously a downloadable PDF file, is now submitted electronically.

Section 4 defines Electronic records and adds 4 new definitions in accordance with latest revision of the Virginia Public Records Act.

Section 5. Updated references to state and university policies and procedures

Approved December 13, 2010 by Vice President for Administrative Services, Sherwood G. Wilson.

- Revision 4

Updates have been made to include the new department name, email and web addresses, etc. Some sections of the policy have been relocated for purposes of clarity. Section 2.3 Legal Matters, Audits, and Investigations has been added to cover legal holds and the need for departments to be aware of the requirements for placing holds on records involved in legal actions and investigations.

Approved January 12, 2015 by Senior Vice President and Provost, Mark G. McNamee.