



Management of University Records

No. 2000

Policy Effective Date:
12/14/2016

Last Revision Date:
9/11/2024

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Affected Parties:
Undergraduate
Graduate
Faculty
Staff

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1.0 Purpose

Virginia Tech's records management policy covers the disposition of university records in all storage formats. Records management contributes to the efficient use of university storage resources and supports compliance with internal controls.

1.1 Background

The *Virginia Public Records Act (VPRA)* establishes a state records management function vested in the Library of Virginia. The Library's state agency records retention schedules are used to determine the retention period and destruction method for university records; the RM-3 Certificate of Records Destruction form documents the approval and completion of records disposal. The *VPRA* requires the designation of a records officer to oversee the records management program at the agency level. Virginia Tech's Director of Records Management serves as the University Records Officer, operates a Records Management Services team, and supports records storage and destruction.

2.0 Policy

This policy governs only records originally created by Virginia Tech. When a record is created, one version of the document (whether the signed version, a copy, or an electronic version) will be designated by the office of record as the "official" record copy. The official record copy 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 at will.

Those items designated as non-records will not be subject to the university's records management program. When there is any doubt as to whether an item is a non-record, it will be considered a university record. All organizational components and employees of the university are subject to this policy and compliance is required. Administrators of university offices of record are responsible for all university records generated and received by their 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 appropriate office. University personnel are responsible for assuring compliance with state and federal statutes pertaining to the confidentiality of university records.

The RM-3 Certificate of Records Destruction form must be completed before destroying designated official record copies of university records series created or administered by an office of record (for example: purchasing records managed in HokieMart by the Procurement Department, or exams administered by an academic department). Disposal of convenience copies of official records does not require formal destruction approval, but their destruction may be subject to 1) the completion of investigative processes such as audits or litigation or 2) requirements for secure disposal of sensitive information as detailed in the state agency records retention schedules.



2.1 Freedom of Information Act

Freedom of Information Act (FOIA) requests cover all versions of university records, including drafts and convenience copies, without reference to “official records” as defined by this policy. Contact the university FOIA officer in the event of open records requests for university files.

2.2 Legal Holds, Audits, and Investigations

Any university record that is relevant to pending or anticipated action, i.e., litigation, claim, audit, investigation, enforcement action, or Freedom of Information Act request shall be retained until final resolution of the matter, regardless of records retention and disposition guidance.

3.0 Roles and Responsibilities

Offices of Record

Administrators of university offices of record (typically senior university officials such as Vice Presidents, Vice Provosts, or Deans) must document their office-of-record status and communicate any records retention requirements for other units through official policy (such as VT [Policy 4085: Retention of Employee Personnel Records](#)) or formal procedure (such as Office of Sponsored Programs Procedure 10014: Records Retention). These administrators or their delegates are also responsible for appointing Records Coordinators to oversee the final disposition of official files under their purview. Records Coordinators should be personnel familiar with the records in question; ideally, they will be someone who creates and manages the records or oversees that process.

A Records Coordinator appointment form is available in the Forms section of the Records Management Services [website](#). New Records Coordinator appointments may be submitted to Records Management Services at any time.

Records Coordinators

Records Coordinators appointed within offices of record are the only university staff authorized to work with the University Records Officer to complete the RM-3 Certificate of Records Destruction form. Records Coordinators are responsible for submitting destruction requests through the Records Management Services website, providing necessary information about those records to Records Management Services (including the presence of confidential information requiring secure destruction methods), and determining that the records proposed for destruction have met retention requirements and are not subject to legal hold, audit, or other investigation. An office of record may appoint multiple Records Coordinators with different areas of specialization, including: Data Stewards or Data Managers, human resources managers, or business and operations managers.

Records Coordinators communicate with the Director of Records Management, serve as a local point of distribution for records management guidance and best practices, and act as a central point of contact for records creators in their own organizational unit. Records Coordinators should be familiar with the official [records retention schedules](#) which are used for the identification and disposition of official records series.

The records destruction request form used to begin the process of completing the RM-3 Certificate of Records Destruction is available in the Forms section of the Records Management Services [website](#). Records coordinators can submit records-related questions or requests for consultation to the Director of Records Management at recmgmt@vt.edu.



Records Creators

Records creators seeking final disposition of official university records in their care must work with a Records Coordinator in their organization or in the office of record. Records creators may themselves submit RM-3 Certificate of Records Destruction request forms through the Records Management Services website, but Records Coordinators ultimately approve the destruction event in the form, and it is recommended that any records destruction request be routed through the appropriate Records Coordinator.

Current Records Coordinator assignment information is available by contacting Records Management Services at recmgmt@vt.edu.

Director of Records Management

The Director of Records Management serves as the University Records Officer, oversees RM-3 Certificate of Records Destruction form completion, and operates a University Records Center providing free offsite paper records storage and destruction services. For more information about services and related requirements, see the Records Management Services [website](#).

The Director of Records Management Services can be reached at recmgmt@vt.edu.

4.0 Definitions

Certificate of Records Destruction

A form documenting the destruction of university records; it is administered by the Library of Virginia, requested by a records coordinator, and approved by the records coordinator and university records officer. Records coordinators can begin the process of completing a Certificate of Records Destruction by completing the records destruction request form on the Records Management Services website.

Disposition

The final stage of the records lifecycle, when decisions are made about the destruction or permanent retention of university records.

Electronic Records

The retention periods for various university records are determined by the informational content of the electronic record, rather than storage method (email, spreadsheets, databases, etc.). The university's electronic records can have various retention requirements depending on the information they contain, but the process is governed by content rather than the format or date of the record.

Office of Record

The university office with formal responsibility for maintaining the official record copy of a given records series. The office or department with the primary responsibility for that record at the university holds the "official record" copy and is responsible for completing a Certificate of Records Destruction for those records at the appropriate time.

Records Coordinator

Appointed by a records custodian to act as a liaison between an office of origin and the university's records officer; records coordinators work with the records officer to submit and approve requests for Certificates of Records Destruction.



Records Retention Schedule

A Library of Virginia-approved guideline stating the required retention period and disposition action of a records series. The Library considers the administrative, fiscal, historical, and legal value of a public record and determines its retention period.

University Records Center

The University Records Center is a free service of Records Management Services. The records center moves inactive records out of university office space into a central storage facility. Folder-level reference services are available to records center customers through campus mail. Records Coordinator approval is required prior to final records destruction.

University Records Officer

Designated by the agency head and serves as a liaison to The Library of Virginia for the purposes of 1) implementing and overseeing the records management program, and 2) coordinating legal disposition, including destruction, of obsolete records. The Director of Records Management is Virginia Tech's University Records Officer.

5.0 References

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

[Library of Virginia Electronic Records Guidelines \(September 2023\)](#)

Policy 4085, Retention of Employee Personnel Records
<https://policies.vt.edu/assets/4085.pdf>

Policy 7100, Administrative Data Management and Access Policy
<https://policies.vt.edu/assets/7100.pdf>

Policy 13015, Ownership and Control of Research Data, Results, and Related Materials
<https://policies.vt.edu/assets/13015.pdf>

[Records Management Services](#) website

6.0 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.



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- 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.



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

- **Revision 5**
Updates have been made to reflect job title and department name changes. Some sections of the policy have been edited for purposes of clarity.

Approved October 8, 2018 by Interim Executive Vice President and Provost, Cyril R. Clarke.

- **Revision 6**
Technical updates for to incorporate applicable Code of Virginia links related to Freedom of Information and Government Data Collection and Dissemination Practices Act.

Approved May 30, 2019 by Executive Vice President and Provost, Cyril R. Clarke.

- **Revision 7**
Policy was revised to include clarifying language, including detailed roles and responsibilities in Section 3.0.

Approved September 11, 2024 by Dean of University Libraries, Tyler Walters.