IRM-017 Records and Information Management

Effective Date Monday, November 26, 2012

Status Final

Last Revised Wednesday, July 24, 2024

Policy Type University

Contact Office University Records & Information Management Office

Health Information Management College at Wise Library

Oversight Executive
Executive Vice President and Chief Operating Officer

Applies To
Academic Division, the Medical Center, the College at Wise, and University-Associated Organizations.

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Reason for Policy

The University of Virginia is committed to adhere to best practices for the management of all University records regardless of format to:

- Comply with state and federal statutory requirements, including the Virginia Public Records Act.
- Reduce risks associated with unintended disclosure of sensitive information.
- Respond efficiently to record requests and preservation orders.
- Protect vital and historical information about the University.

Definition of Terms

Archival/Historical Records

Description

University records that document transactions or activities of the University designated by the University Archives and/or designated historical records repository, the agency's designated records officer and/or the Library of Virginia as having long-term historical value. Records with historical value may include documentation of decisions, activities, and products of the University. Examples of historical records include but

are not limited to: Board of Visitors' meeting minutes, President’s correspondence, research final reports, and accreditation records.

Records Officer

Description

An appointed official designated by the state agency who is responsible for providing standards, procedures, training and guidance to meet requirements for the proper management of University records. Appointments of agency records officers must be filed with the Library of Virginia per state code § 42.1-85 C.

Records Retention and Disposition Schedule

Description

A listing of records series, approved by the Library of Virginia, that provides retention and disposition instructions for University records.

Disposition

Description Final destruction or transfer of records to the proper archival repository.

Retention

Description

The length of time records should be kept in a certain location for administrative, legal, fiscal, historical, or other purposes.

University Records

Description

Recorded information that documents a transaction or activity by or with any appointed board member, officer, or employee of the University. Regardless of physical form or characteristic, the recorded information is a University record if it is produced, collected, received, or retained in pursuance of law or in connection with the transaction of university business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a University record. University records include but are not limited to: personnel records, student records, research records, financial records, patient records, and administrative records. Record formats/media include but are not limited to: email, messaging (texts, instant messaging, etc.), posts (social media or collaboration software), databases, electronic files, paper, audio, video, and images (digital and printed).

Closed Records

Description

Records which have restricted access due to legal or administrative confidentiality but would eventually be open. (Society of American Archivists Definition: Closed.)

Policy Statement

The University of Virginia will comply with federal and state statutory requirements and specifically, the Virginia Public Records Act, in the handling of University records.

1. **Agency Requirements:**
   The Academic Division (Agency 207), the Medical Center (Agency 209), the College at Wise (Agency 246) must:
   A. ***Records & Information Management:***
      1. Comply with retention and disposition instructions in the applicable Records Retention and Disposition Schedules approved by the Library of Virginia. For the Academic Division, see Records and Retention Schedules. Contact the Medical Center and/or the UVA Wise records officers for directions on which records retention schedules to use.
      2. Store physical records in compliance with the Physical Records Storage Standards for onsite and offsite locations. Offsite storage requires review and approval of the agency's designated records officer.
      3. Store electronic records in accordance with the University Data Protection Standards and guidelines from the agency's records officer for management and authenticity.
      4. Destroy University records once the retention period in the University Records Retention and Disposition Schedules has expired. A Certificate of Records Destruction (RM3 Form) must be approved by the agency's records officer as required by the Virginia Public Records Act before destruction. For the Academic Division, see Destruction of Public Records. Contact the Medical Center and/or UVA Wise records officers for directions on completion of the Certificate of Records Destruction (RM3 Form).
   B. ***Special Records Requests:***
      In addition, agencies/departments/units should adhere to the following:
      1. ***Archival/Historical Records:***
         Transfer records designated with historical/archival value, as listed in the Records Retention and Disposition Schedules, to the designated archival repository. Leadership (President, Chief Operating Officer, Provost) records are closed for 10 years after the individual holding the position has left the leadership position.
      2. ***Audits, Court Orders, Investigations, and Freedom of Information Act Requests:***
         Retain all records requested or placed on hold by internal offices (such as University Counsel, Internal Audit, Office of Sponsored Programs, University Communications, UVA Health's Chief Corporate Compliance and Privacy Officer, etc.) until cleared by the office placing the hold, regardless of retention requirements. Offices placing holds or requests for University records should copy the agency's records officer on all notices.
      3. ***Review of Electronic Records Systems:***
         Departments and units should review with the University Records & Information Management Office the implementation of electronic systems, including cloud services for compliance with Records & Information Management policies, standards, and guidance.
2. **University-Associated Organizations (UAOs):**
   While University-Associated Organizations are not subject to the Virginia Public Records Act, UAOs are strongly advised to follow best practices for records and information management. UAOs may use consulting services provided by the University Records & Information Management Office (Agency 207).
3. **Responsibilities:**
   The ***agency records officer*** is responsible for developing standards, guidance, and providing assistance to organizational units within their agency for managing University records, including designation of confidential or records containing highly sensitive data.

All Academic Division, Medical Center, and College at Wise employees (faculty and staff) and All Board Members should receive records and information management guidance about their responsibilities as an employee/board member at the time of hire/appointment. Each agency will determine the area responsible for providing records management guidance. For the Academic Division, completion of *Records & Information Management at UVA* online session (5 min) is required.
Supervisors should support additional records and information management training for their employees, especially those with records responsibilities, from the agency's records officer. It is strongly recommended that employees with records responsibilities complete *Records Management Basics* (on-demand training). Additional online training and resources can be found here.

4. **Compliance with Policy:**
   Failure to comply with the requirements of this policy may result in disciplinary action up to and including termination in accordance with relevant University policies.

   Direct questions about this policy to the University Records & Information Management Office, Health Information Management at the Medical Center, or the College at Wise Library.

Procedures

For specific procedures and guidance:
Academic Division (Agency 207): See the University Records & Information Management Office website.

Medical Center (Agency 209): Contact the UVA Medical Center Records Officer, Crystal Ford.

College at Wise (Agency 246): Contact the UVA Wise Records Officer, Kimberly Larmee.

All other agencies and University-Associated Organizations: Contact the University Records & Information Management Office.

Related Information

Records & Information Management Training & Resources

Virginia Public Records Act, Chapter 7 of Title 42.1 of the Code of Virginia (§ 42.1-76 et seq)
Virginia Freedom of Information Act, Chapter 37 of Title 2.2 of the Code of Virginia (§ 2.2-3700 et seq)

University Policies:
IRM-003: Data Protection of University Information
IRM-016: Use of Email as Official Means of Communication with Students
RES-002: Ownership, Retention, Safeguarding, Management, and Transfer of Research Records
STU-002: Rights of Students at the University of Virginia Pursuant to the Family Educational Rights and Privacy Act (FERPA)

Medical Center Policies:
0223: Government and Regulatory Investigation Response
Records Management: Records/Document Retention and Disposition

Major Category Information Resource Management

Next Scheduled Review Saturday, July 24, 2027

Revision History

Updated title of required training in Section 3 1/23/25; Revised 7/24/24; University-Related Foundation changed to UAO 5/10/22; Added Compliance section 7/21/21; Updated links 9/14/17, Updated Oversight Executive, 5/30/17, Revised 1/15/2013.

Policy Summary

This policy supports the consistent, efficient, and comprehensive management of University records and information. It establishes expectations for all University state agencies (207, 209, and 246) to comply with the Virginia Public Records Act via standards and guidelines issued by agency designated records officers for the management of University records. It clarifies that University-Associated Organizations are not subject to the Virginia Public Records Act but are strongly advised to follow best practices for records management.

Supercedes Policy Text

II.C.I Records Retention and Disposition.

Approved By Policy Review Committee

Approved Date Monday, November 26, 2012