



OFFICE OF THE VICE PRESIDENT AND
CHIEF INFORMATION OFFICER
Information Technology Services

OFFICE OF THE PRESIDENT
1111 Franklin Street, 7th Floor
Oakland, California 94607-5200

September 17, 2018

CHANCELLORS
ACADEMIC COUNCIL CHAIR MAY
LABORATORY DIRECTOR WITHERELL
ANR VICE PRESIDENT HUMISTON

Re: Systemwide Review of Proposed Presidential Policy BFB-RMP-7 Protection of Administrative Records Containing Personally Identifiable Information

Dear Colleagues:

Attached for Systemwide Review is a proposed revision of Presidential Policy BFB-RMP-7, Protection of Administrative Records Containing Personally Identifiable Information.

The University of California Records Management Committee (RMC) is reviewing and updating policies in the BFB-RMP series. As a result of that review, it is consolidating and updating three policies in the series that cover related topics – BFB-RMP-7, Privacy of and Access to Information Responsibilities; BFB-RMP-11, Student Applicant Records; and BFB-RMP-12, Guidelines for Assuring Privacy of Personal Information in Mailing Lists and Telephone Directories. These policies are found at <https://www.ucop.edu/information-technology-services/policies/records-management-policies.html>. Also attached is a redline document that compares language in existing policies RMP-7, RMP-11, and RMP-12 with the proposed revision of RMP-7.

The scope of the revised policy is limited to personally identifiable information in administrative records, regardless of whether the records are in paper, electronic, or other media. BFB-RMP-1, University Records Management Program, defines administrative records as follows:

“The term ‘**administrative record**’ is used to describe any record that documents or contains valuable information related to the organization, functions, policies, decisions, procedures, operations, or other business activities of the university.”

BFB-RMP-1 also states that the Records Management Program:

“...applies to all administrative records, regardless of their medium. The Program does not apply to:

- Administrative records held by the Principal Officers of The Regents,
- Teaching and research records (e.g., library materials, faculty research and teaching materials, student examinations), or
- Records pertaining to individual patient care (medical records).”

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In consolidating the three existing policies into a revised and updated RMP-7, the RMC eliminated sections that are no longer pertinent, retained sections that are still relevant, and updated others. The revised policy clarifies the roles of Privacy Officials, Records Management Coordinators, and Information Practices Coordinators, and incorporates the UC Statement of Privacy Principles and Values.

UC Records Manager Laurie Sletten, former Systemwide Privacy Manager Roslyn Martorano, and, recently, current Systemwide Privacy Compliance Manager Scott Seaborn led the review and developed the draft in conjunction with a committee of Records Management Coordinators and Privacy Officers. The draft has undergone significant systemwide review and been revised to reflect input from key functional areas. The draft was first presented to the Policy Advisory Committee (PAC) in September 2016, after which it was vetted with various groups, as shown below:

- Records Management Coordinators: 11/28/2016, 1/17/2017, 1/26/2017, 6/15/2017, 1/22/2018
- Information Practices Coordinators: 11/28/2016, 6/15/2017
- Privacy Officers: 11/28/2016, 1/17/2017, 6/15/2017, 7/26/2018
- HIPAA Officers: 11/28/2016, 1/17/2017, 6/15/2017
- Office of the General Counsel: 1/17/2017, 6/15/2017, 7/26/2018
- Information Security: 11/28/2016, 1/17/2017, 1/26/2017

The updated draft was re-presented to the PAC on June 20, 2018, at which point the PAC recommended initiation of the formal Systemwide Review.

Systemwide Review

Systemwide Review is a public review distributed to the Chancellors, the Director, Lawrence Berkeley National Laboratory, the Chair of the Academic Council, and the Vice President of Agriculture and Natural Resources requesting that they inform the general University community, affected employees, and union membership about policy proposals. Systemwide Review also includes a mandatory, three-month full Senate review. Employees should be afforded the opportunity to review and comment on the draft policy. Attached is a Model Communication which may be used to inform non-exclusively represented employees about these proposals. The Labor Relations Office at the Office of the President is responsible for informing the bargaining units representing union membership about policy proposals.

If you have any questions, please contact UC Records Manager Laurie Sletten at 510-987-9411. Please submit your comments to Laurie Sletten at laurie.sletten@ucop.edu no later than December 17, 2018.

Sincerely,



Tom Andriola
Vice President & UC Chief Information Officer
Information Technology Services

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Attachments: Proposed Presidential Policy BFB-RMP-7, Protection of Administrative Records
Containing Personally Identifiable Information
Redline of Existing RMP-7, RMP-11, and RMP-12
Model Communication

cc: President Napolitano
Provost and Executive Vice President Brown
Executive Vice Chancellors/Provosts
President's Advisory Group
Vice President Duckett
Vice President Ellis
Vice President Holmes-Sullivan
Vice Provost Carlson
Vice Provost Gullatt
Deputy General Counsel Woodall
Vice Chancellors/Vice Provosts of Academic Personnel/Academic Affairs
Academic Personnel Directors
Chief of Staff Nava
Deputy Compliance Officer Myjer
Executive Director Baxter
Executive Director Peterson
Executive Director Chester
Director Hairston
Director Grant
Manager Smith
Manager Steinhoff
Manager Jordan
Manager Crosson