



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

OFFICE OF THE PRESIDENT  
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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](mailto: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