

December 4, 2018

Robert May
Chair, Academic Council

RE: Systemwide Senate Review: Proposed Revisions to Presidential Policy BFB-RMP-7 Protection of Administrative Records Containing Personally Identifiable Information

Dear Robert,

The Executive Board of the UCLA Academic Senate discussed the proposed Revisions to Presidential Policy BFB-RMP-7 Protection of Administrative Records Containing Personally Identifiable Information, at its meeting on November 8, 2018. The Executive Board solicited comments from standing committees of the Senate, as well as the Faculty Executive Committees, to maximize faculty feedback; the individual responses from our various committees are attached.

Executive Board members expressed concerns regarding the following:

- a) Under Section III, Policy Text, (page 5), the reference to APM-160 is footnoted and not part of the text, and seem an afterthought. Executive Board members recommend pulling the footnote into the actual text.
- b) Under Section B. Management of Records containing PII, members recommend changing individuals “may” be notified... to “must” be notified ...
- c) Under Section V.A.2, Third Parties (page 11), the categories do not make sense and are ambiguous. The original document had “or” after each category, which has been removed from *a* and *b*; meaning is unclear. Is it *a*, *b*, *c*, then “or” *d*? Members request that the text for these categories be made clear. Regardless, members disagreed with “*d*. Other legal exceptions apply.”

The Executive Board appreciates the opportunity to opine. Please feel free to contact me should have any questions.

Sincerely,



Joseph Bristow
Chair, UCLA Academic Senate

cc: Hilary Baxter, Executive Director, Systemwide Academic Senate
Sandra Graham, Immediate Past Chair, UCLA Academic Senate
Michael Meranze, Vice Chair/Chair-Elect, UCLA Academic Senate
Michael LaBriola, Principal Policy Analyst, Systemwide Academic Senate
Linda Mohr, Chief Administrative Officer, UCLA Academic Senate