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## CHANCELLORS

### Records Management and Privacy Policy: Vital Records Protection

I am pleased to issue a technical revision to Records Management and Privacy Policy: Vital Records Protection (RMP-4). The policy is available online at <http://www.ucop.edu/ucophome/policies/bfb/rmp4.html>. Effective immediately, this revision to RMP-4 replaces the version issued on July 1, 1987.

The retention period listed in RMP-4 Attachment A is obsolete and conflicts with the Records Disposition Schedules Manual. Therefore, this technical revision removes Attachment A (*Retention Period for Payroll Files*) from RMP-4 and replaces it with a reference to the University's Records Disposition Schedules Manual.

RMP-4 will be reviewed and updated as part of the UC Privacy and Information Security Initiative.

Responsibility for implementation of RMP-4 is delegated to David J. Ernst, Associate Vice President – Information Resources and Communications and Chief Information Officer. Questions about the technical revision may be directed to Stephen Lau, Systemwide Director for Information Technology Management and Policy. He may be reached by telephone at (510) 987-0409 or by electronic mail at [Stephen.Lau@ucop.edu](mailto:Stephen.Lau@ucop.edu).

With best wishes, I am,

Sincerely yours,

Mark G. Yudof  
President

Enclosure: RMP-4

cc: Members, President's Cabinet  
Lawrence Berkeley National Laboratory Director  
Academic Council Chair Simmons  
Associate Vice President Ernst  
Campus Electronic Communications Policy Coordinators  
University Policy Office  
Director Stephen Lau

# RMP-4, Vital Records Protection

April 7, 2011

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## I. REFERENCES

- A. Business and Finance Bulletin RMP-1, "University Records Management Program."
- B. Business and Finance Bulletin RMP-2, "Records Disposition Program and Procedures."
- C. University of California Records Disposition Schedules Manual.

## II. INTRODUCTION AND DEFINITION OF VITAL RECORDS

One part of the total University Records Management Program is the identification and protection of vital records. A record is vital when the re-establishment of an authentic replacement of a lost or unavailable record would be impossible or prohibitively difficult and, thus, abridge, jeopardize, or otherwise affect a significant right of an individual, a significant right or asset of the University, or the performance of an essential function of the University so adversely that extraordinary precautions are required to preserve and protect effectively that record from both normal and unusual hazards, present and potential.

## III. PURPOSE

The purpose of this Bulletin is to establish the guidelines whereby the University will be assured of the protection of its vital records through:

- A. Establishment of criteria for identification of vital records.
- B. Selection of secure and economical methods of protection.
- C. Continuing review and re-appraisal of records to discover changing conditions and requirements for protection.

Adherence to these guidelines should ensure that vital records of the University are reasonably protected as far as is economically possible from such hazards as fire, flood, and vandalism.

## IV. CRITERIA FOR IDENTIFICATION OF VITAL RECORDS

There are two kinds of University records which are classified as vital:

- A. Records which are essential to the protection of the rights of individuals.

B. Records which are essential to the protection of the University's rights, assets, and/or the execution of its public (contractual) obligations.

Examples of the first type of vital records are current payroll records necessary to pay employees, master student academic records necessary to show completion of course work, and the employee service records required for protection of tenure and retirement status.

The second type of vital records is exemplified by drawings and specifications required to repair and maintain the University's facilities; records necessary to establish University ownership of buildings, equipment, and land; patent license agreements; and promissory notes and evidence of other receivables.

Exact identification of a particular record as vital can be accomplished only on a judgmental basis. The owners or users of the record are most able to apply such judgment, using criteria IV.A and B., above. However, the number of truly vital records should be very small in relation to total records held in any one department. It is estimated that less than one percent of all records held by the University can be clearly identified as vital. Some departments and offices may have more than one percent and others may have none at all.

Many types of records are of great importance but not of vital importance. Such records require much effort and expense to reconstruct, if lost, or have intrinsic historical value. The vital records program does not involve those important records, although the standards and methods of protection outlined in this Bulletin may well be applied by any department to them to the degree that the values, risks, and available resources for protection make such protection appropriate.

#### V. PRE-IDENTIFIED VITAL RECORDS

This Bulletin identifies those records held by the University which have been determined to be vital. For ease of reference, those records are also annotated in the Records Disposition Schedules Manual; the symbol (V) after the Office of Record indicates a vital record.

Office of the President Records	Campus Records
Endowments, Gift, Bequest Files	As-built Drawings
Patent License Agreements and Financial Records	Equipment Inventory Records
Promissory Notes - Benefits Loans Program	General Ledger (GL060) * (including Manual of Accounts)
Promissory Notes & Deeds of Trust - Faculty Housing Program	Gift and Other Donation Files, by Donor
Royalty Agreements - U.C. Press	Library Card Catalog and Shelf List

UCRS Member Records

Ownership Records of Vehicles,  
Vessels, and Other Major Assets

Patient Medical Records

Payroll Records

Employee Folders, Accounting  
Office Payroll Division

Employee Records, Personnel  
Department

Health Plan and Life Insurance  
Enrollment, Change and  
Cancellation (Form U1630)

Master Payroll Files  
(refer to Records Disposition  
Schedule Manual)

Promissory Notes and Evidence of  
Other Receivables

Student Grade Record Card  
(including University Extension)

\* For all numerical and alphabetical codes maintained on campus.

Departments holding master copies of those pre-identified records have the responsibility to ensure they are protected in accordance with the guidelines outlined in this Bulletin.

This list of pre-identified vital records is not intended to be all-encompassing, for additional vital records may be identified by departments under Section IV. Records held by any of the Offices of The Regents, and evaluated by them to be vital, are not included on this list, but are so designated in the University Records Disposition Schedules Manual.

## VI. SELECTION OF METHODS OF PROTECTION

A. The most important factor guiding the selection of a method of protection for vital records is the ratio of the effectiveness of the protection method to the cost of that protection. Since it is possible to attain no more than relative security, the best choice is the one for which the cost of security is most closely in line with the degree of risk. Beyond the evaluation of actual risks of loss for vital records, three other factors have a measure of importance in the selection of protection methods:

1. Need for accessibility. Vital records which must be close at hand and available for use at all times may require different methods of protection from those records

infrequently used.

2. Length of retention. The best methods for protecting vital records of a short-term nature may be different from those methods best for long-term or permanent records.
  3. Physical qualities of records. Susceptibility of records to destruction from heat, water, chemicals, and aging varies with both the record medium and the duration of retention. Magnetic tape and film often require different protection from that needed for paper documents. Paper itself varies greatly in its ability to withstand aging.
- B. Six methods of records protection are reviewed below. More than one of those methods can be used to protect a given vital record series. It is not uncommon to protect the active portion of a series through the preservation of existing duplicates while protecting the inactive portion through other means. Methods 5 and 6 should be considered secondary methods of records protection. For instance, if it is not feasible to implement methods 1, 2, 3, or 4 for reasons of economics, method 5 or 6 should be used to provide at least a minimum level of protection.
1. Preservation of existing duplicate copies at another location. Many records already have a form of "natural protection" because of the regular paperwork routine. If such duplicates exist for a vital record series, the preservation of those duplicates is a very effective protection. The likelihood of both copies being destroyed at any one time is extremely low. This method is equally effective for long- and short-term retention, durable or fragile records, and high- or low-access requirements.
  2. Creation of special duplicate copies for preservation at another location. Special, duplicate "security" copies of many University records series are now being created. Methods of creating those copies range from direct reproduction on copying machines to microfilming, duplication of magnetic tapes, and production of special "protection" carbon copies at the time of original typing. This kind of protection is as effective in all ways as the first method described. However, the cost of creating duplicate copies is relatively high.
  3. Preservation of source records which would be used to reconstruct vital records. In many cases documents which are sources for vital records are held by the University or by another agency. If such sources can be identified and agreements made on holding them for the length of time protection is required, this method of protection can be nearly as effective for all situations as the first two. Effectiveness is reduced only slightly because several source document series may be involved, any one of which might be destroyed. The overall cost of this method may be higher than the first method, because larger volumes of source records must be retained for longer periods than would ordinarily be the case. However, the net cost of this method will usually be much less than the cost of

creating special duplicate security copies.

4. Storage in special equipment such as fire resistant cabinets, safes, or vaults. Original and unique copies of vital records can be protected from most hazards through the use of special storage equipment. While the protection thus obtained is not absolute, its relative effectiveness is only slightly lower than the first three methods. However, of all protection methods, the use of special storage equipment is usually the most costly. This method should be considered only when the other methods are physically not feasible.
5. Removal of hazardous conditions from area of storage. By removing unnecessary hazards such as combustible materials and steam or water pipes and by eliminating undesirable conditions such as air-borne chemicals and extremes of heat or humidity, a relative improvement can be achieved in protection of records. Since the effectiveness of this method is low, it should be considered only when other methods are economically unfeasible.
6. Relocation of records to a less hazardous area. Because of differences in construction, some University buildings are less hazardous for records storage than others. The effectiveness of relocation as a method of protection can be equal to or slightly better than that for removal of hazardous conditions. Cost will be equally low or lower. However, when requirements exist for frequent access to the records, this method may prove unfeasible. If relocation is considered, the campus Records Coordinator should be consulted to determine the relative safety of various storage places.

## VII. RESPONSIBILITIES

### A. Departments and Offices

The individual department is responsible for reviewing its records in relation to the guidelines set forth in this Bulletin, identifying by title those records which are vital, and advising the Records Management Coordinator at that location of the identity of the vital record and the type of protection given to it. Reporting on vital records, as identified in Section V, is mandatory. In cases where protection is not provided for any vital record, a short explanation should be provided to the Records Management Coordinator.

### B. Records Management Coordinators

Each Records Management Coordinator is responsible for coordinating the Vital Records Protection Program at his/her location and for reporting the status of the program to the Chair of the Records Management Committee.

### C. Chair of the Records Management Committee

The Chair of the Records Management Committee is responsible for the overall management and review of the Vital Records Protection Program. The Chair will prescribe the required frequencies of vital records reports, which will be not less than once every five years.