1.0 Reason for Policy

This policy describes the document management, retention, and access to Institutional Biosafety Committee (IBC) records.

2.0 Scope of Policy

This policy is University-wide. All components of the University of Minnesota and its partners must adhere to this policy.

3.0 Policy Statement
IBC files must contain a complete history of all IBC actions related to review and approval of an application, continuing review, amendments, and incident reports. IBC records for a study are organized to allow reconstruction of a complete history of IBC actions related to the review and approval of the study. Currently, all IBC submissions are in electronic form and can be viewed on ImageNow.

Records must be accessible for inspection and, if necessary, copying by authorized representatives of the Sponsor, funding department, or agency, regulatory agencies and institution auditors at reasonable times and in a reasonable manner.

The HRPP IBC document retention policy and procedures follow federal, state and local law, sponsor requirements, and organizational policies and procedures. The methods for record retention should allow access by authorized personnel and ensure documents are kept safely and confidentially.

**Procedure:**
- **Document Retention:**
  
  Every attempt is made to maintain document maintenance according to IBC process as follows:
  - HRPP/IBC retains all records regarding an application (approved or not initiated) for a minimum of three (3) years following completion of a study
  - HRPP/IBC maintains and retains all records regarding administrative activities that affect review activities, and HRPP/IBC maintains current and obsolete copies of the Standard Operating Policies and Procedures

- **Management of Electronic Records:**
  - Members who use portable storage devices (e.g. flash memory cards, CDs, etc) are asked to return these devices following review of assigned materials. IBC staff delete stored information following meetings and re-use these devices
  - Members who receive links to URLs for completion of committee review are required to login using their University assigned x500 and are expected not to share information obtained from these links
  - Files downloaded from these links must be deleted following the review

Access to HRPP records is allowed in compliance with the Minnesota Data Practices Act. The Data Practices Act contains many of the statutory provisions that classify various types of government data as other than public, and thus restricts access to data in some way. Data that are not public are accessible to HRPP staff and other University employees on a need-to-know basis and are accessible outside the University where authorized by law. These data are classified primarily in one of the following ways:

- **private:** data identifying an individual that are only available to the individual or with the individual’s consent (Minn. Stat. § 13.02, subd. 12)
- **confidential:** data identifying an individual that are not available to anyone outside the entity holding the data, including the individual (Minn. Stat. § 13.02, subd. 3)
• nonpublic: data on a business or other entity that are only available to the subject of the
data or with the subject’s consent (Minn. Stat. § 13.02, subd. 9)

The HRPP complies with the Minnesota Data Practices Act when evaluating a requester’s access
to records.

4.0 Required approvals for this document

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
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<tbody>
<tr>
<td>Executive Director</td>
<td>Moira A. Keane</td>
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5.0 Revision History

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<th>Revision</th>
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<td>12/20/11</td>
<td>Policy update</td>
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<tr>
<td>12/09/09</td>
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<td>03/02/10</td>
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<tr>
<td>07/11/06</td>
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To obtain a copy of a historical policy, e-mail ibc@umn.edu or call 612-626-5654