

VIRGINIA MILITARY INSTITUTE
Lexington, Virginia

GENERAL ORDER)
NUMBER 18)

3 September 2020

Alumni Files Access Policy

1. References:
 - a. Family Educational Rights and Privacy Act (FERPA)
20 USCS 1232g, 34 CFR Part 99
 - b. Government Data Collection and Dissemination Practices Act, Virginia Code § 2.2-3800 *et seq.*
 - c. Virginia Freedom of Information Act (FOIA), Virginia Code § 2.2-3700 *et seq.*
2. Maintenance of Alumni Records
Files of alumni within the most recent twenty years are kept in the Registrar's Office File Room, Shell Hall. These files include public domain information (e.g., press clippings), and VMI education records combined with post-VMI private records.
3. Release of Alumni Records
 - a. Public domain information such as press clippings or excerpts from *Bomb* are not protected under FERPA and will be released in accordance with a valid request under FOIA without prior consent of the subject of the records. Because such information has public information value to VMI, it will continue to be maintained in VMI files in accordance with General Order 21, Records Management Policy.
 - b. VMI education records are covered by FERPA and exempt from release under FOIA. Access to and disclosure of VMI education records, including for individuals who have graduated or resigned from VMI, will be governed by the rules and processes in General Order 9, Family Educational Rights and Privacy Act (FERPA) and General Order 21, Records Management Policy.
 - c. VMI will not release the address, telephone number, or email address of alumni in response to a FOIA request absent written consent of the subject individual(s) to release.
 - d. Private post-VMI information of alumni is not covered by FERPA, but is protected by the Government Data Collection and Dissemination Practices Act. Access to private post-VMI records of alumni will be granted only to VMI officials acting in an official capacity with a legitimate educational interest in receiving the records. Information may be released to other agencies only as permitted by Virginia Code § 2.2-3803.
 - e. Any individual who challenges a denial of access to alumni records should be referred to the Chief of Staff for resolution.

- f. If a record is placed in an alumni file by a VMI-affiliated organization (e.g., VMI Foundation, Alumni Association, Keydet Club) and the organization did not keep a copy of the item and later needs a copy, the organization may be granted access to that specific item.
4. VMI Alumni Archives, Preston Library
 - a. VMI is committed to preserving its records of enduring historical significance, and recognizes that the historical cadet permanent records housed in the VMI Archives comprise an important research collection for genealogists and historians.
 - b. Historical Research Files – The cadet record is defined as historical if the subject of the record is deceased **and** 80 or more years have passed since attendance at the Institute. Information from these historical records can be released upon request to the VMI Archives.
 - c. All Other Alumni Files
 - (1) In the absence of documentation to the contrary (e.g., obituary, letter from immediate family member, Alumni Association record), alumni are presumed to be living until the 80-year benchmark referenced above has been reached.
 - (2) Files of living alumni are closed, with the following exceptions:
 - a. The individual who is the subject of the records may have complete access to his/her own file.
 - b. File access may be granted to a third party if the subject individual has provided the Archives with a written waiver granting access.
 - c. Public domain information can be released without obtaining permission.
 - (3) Archival records of deceased alumni which do not meet the 80-year benchmark for historical designation may be released at the discretion of the Head of Archives and Records Management, with due consideration given to the privacy of living family members and other institutional interests.

FOR THE SUPERINTENDENT:

James P. Inman
Colonel, US Army (Ret.)
Chief of Staff

DIST: E, Cadets

OPR: Registrar