



HR Highlights February

COVLC Data Retention Policy Implementation

With almost 1 million active and inactive user accounts, the COVLC is facing system performance challenges. The COVLC contains personnel records (training records) that fall under the Library of Virginia's General Schedule GS-103, Personnel Records. To comply with this schedule and improve system performance, DHRM is implementing a data retention policy for the COVLC. Records will be retained for the necessary time frame to align with GS-103 and then will be removed from the system. External stakeholder records will be retained for a different time frame and will also be removed from the system upon conclusion of that time frame.

Identification of records is in process and agencies will receive regular monthly updates on our actions and plans, including methods by which agencies can maintain limited records that may be necessary for specific populations.

For 20 years, the COVLC has been serving agencies as a platform to create, catalog, manage, deliver, track, and report on training, learning, and development activities for the Commonwealth's employees and for external stakeholders dependent on agency services. In this time, the system has accumulated nearly 1 million active and inactive user accounts—260,000 active and 650,000 inactive—leading to system performance challenges and occasional latency.

[The Code of Virginia § 42.1-85](#) grants the Library of Virginia (LVA) the authority to issue regulations governing the retention and disposition of state and local public records. Accordingly, LVA has developed records retention and disposition schedules, including General Schedule GS-103, Personnel Records. This schedule specifies the retention period and disposition method for various personnel records, including training records within the COVLC.

To comply with LVA requirements and improve system performance, DHRM will implement a data retention policy for the COVLC. Employee training records/accounts (transcripts) will be retained for five years after separation from employment with the Commonwealth of Virginia. This period allows for the retention of certification and qualification records included on employee transcripts, in compliance with GS-103.

The COVLC also contains records for non-state employees, which do not fall under GS-103. These records will be retained for two years after the last account access.

We understand that this is a significant change from previous record management practices. To provide you with advance notice and to collaborate with agencies on the implementation of this new policy, we aim to remove records annually beginning in 2025.

Currently, we are working with our DHRM IT partners to identify a process for the removal of records. This complex task requires coordination across multiple systems (PMIS, Cardinal, and the COVLC). We are also exploring options for agency retention of records that may need to be kept for longer periods for specific populations. These options may include agency download of transcripts and agency reports containing information from transcripts.

We are still in the early stages of this effort and wanted to share this information with you promptly to allow for thoughtful navigation of this change. As we progress, we will provide monthly updates in the COVLC Connection, including progress reports and any specific requests for your support.

We recognize that change can be challenging and may disrupt established practices. However, we believe that this transition not only ensures compliance with records retention requirements but also improves system performance for all employees, external stakeholders, administrators, and agencies.

Please reach out to the [COVLC Helpdesk](#) with any questions and look for ongoing updates in the COVLC Connection Newsletter.