Implementing Board Policy 8.00.01

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## 1.0 Purpose

Community Colleges of Spokane ("CCS") must be able to communicate quickly and efficiently with employees and enrolled students to conduct official college business. Email is an available and appropriate medium for such communication. It is important to use official email effectively and not overuse mass email functionality.

#### 2.0 Definitions

- **2.1 Personal Information:** means an individual's first name or first initial and last name in combination with any one or more of the following data elements:
  - Social security number;
  - Driver's license number or Washington identification card number;
  - Account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account, or any other numbers or information that can be used to access a person's financial account;
  - Full date of birth:
  - Private key that is unique to an individual and that is used to authenticate or sign an electronic record;
  - Student, military, or passport identification number;
  - Health insurance policy number or health insurance identification number;
  - Any information about a consumer's medical history or mental or physical condition or about a health care professional's medical diagnosis or treatment of the consumer; or
  - Biometric data generated by automatic measurements of an individual's biological characteristics such as a fingerprint, voiceprint, eye retinas, irises, or other unique biological patterns or characteristics that is used to identify a specific individual;
  - User name or email address in combination with a password or security questions and answers that would permit access to an online account; and
  - Any of the data elements or any combination of the data elements described in this subsection without the consumer's first name or first initial and last name if:
    - 1. Encryption, redaction, or other methods have not rendered the data element or combination of data elements unusable: and
    - 2. The data element or combination of data elements would enable a person to commit identity theft against a consumer.

Personal information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

**2.2 Secured**: means encrypted in a manner that meets or exceeds the national institute of standards and technology standard or is otherwise modified so that the personal information is rendered unreadable, unusable, or undecipherable by an unauthorized person.

# 3.0 Responsibilities

- **3.1** CCS provides email addresses and email service to all employees so they can effectively and efficiently share important and timely work-related information.
- 3.2 District and college administrators or their representatives depend on email to communicate important information to the district community; accordingly, email communications authorized as an "official communication" should be received and read as any other official communication.
- 3.3 Employees are responsible for reviewing messages received through their CCS email account on a frequent and consistent basis and responding as appropriate, during contractual days. Communications may be time sensitive. CCS email accounts are for college business-related communications only.

## 4.0 Non-Disclosure of Sensitive/Protected Information

Sensitive or protected Personal Information shall not be transmitted by unencrypted email. Unencrypted email is inherently a non-secure medium of transmission and is easily captured or redirected. Any emails with Information protected by FERPA and HIPAA regulations must be sent using CCS email encryption settings.

#### 5.0 Public Documents

- 5.1 Use of CCS email is part of the workflow of CCS employees and must be restricted to work use. Personal use is limited to De Minimis use restrictions in 7.30.05-A Acceptable Use of Information Technology Resources. Under no circumstances may CCS email be used for political campaign purposes or for personal commercial business interests.
- 5.2 All CCS emails are considered public records and are subject to public disclosure. In the case of a public records request their contents will be disclosed unless a specific exemption applies. Emails can also be reviewed by CCS in cases of employee investigations. Employees are to avoid content and language in CCS emails that could cause harm to the organization or its reputation.

# 6.0 Official Email Distribution Groups

6.1 CCS email is used to quickly and effectively communicate with individuals and large groups of people. Current email groups are maintained to enable offices, work units, departments and programs to reach large segments of the district. Each email group has an administrator to manage membership and use. Administrators of each group may establish the purpose and usage expectations for the email groups they administrate. This can include determinations about who is part of the group and who is authorized to send emails to the entire email group. These group-specific procedures should be clearly communicated to members of that group.

# 7.0 CCS Districtwide Email Group

7.1 CCS maintains a CCS email group (CCS Everyone) that includes all faculty, staff, administrators and trustees. This email group was created to enable official and important districtwide information to be distributed. There is an expectation that it should be received and read as any other official communication.

7.2 To preserve the official nature of this email group, the people authorized to issue messages using CCS Everyone is limited to members of the CCS Executive Cabinet (Chancellor, Presidents, Provost, CIO, CIAO, CFO, CSAO and CCO) and their designees. People who want to send a districtwide email should contact the CCS Executive Cabinet member who oversees their unit within CCS. Executive Cabinet members may authorize designees with an official CCS-wide notification purpose (ex. IT Service notices, Emergency notices, Payroll deadlines) to send CCS Everyone emails in keeping with their role at CCS.

#### 8.0 Procedure for Use of Districtwide Mass Email

- **8.1** Districtwide emails are restricted to messages meeting one or more of the following standards:
  - Communicates important information from executive leadership;
  - Provides essential information for the operation or execution of daily business;
  - Notifies the districtwide community of significant events or changes in governance, policy, and practice;
  - Announces system wide computer, network or ctcLink service interruptions, changes or security risks or
  - Alerts people districtwide about situations regarding immediate health and safety
    - o It is the responsibility of the CCS Executive Cabinet member to ensure the benefit of a mass email communication with respect to the immediacy of the communication, districtwide distribution, and significance of the content for the fulfilment of the CCS mission substantially outweighs the system wide burden associated with distribution of a mass electronic email.

## 9.0 Alternative Ways to Share Information throughout CCS

9.1 For information that does not meet the above requirements of essential and important information, other communications tools should be used. This includes submission to the districtwide weekly employee newsletter, *On the Inside*, or use of college and district email distribution lists in accordance with the policies of the college and district administration.

## 10.0 Related Information

- **10.1** CCS Administrative Procedure <u>7.30.05-A Acceptable Use of Information Technology Resources</u>
- **10.2** RCW Chapter <u>19.255 Notice of Security Breaches</u>
- **10.3** Directions for encrypting email <a href="https://ccspokane.freshservice.com/a/solutions/articles/3000046274">https://ccspokane.freshservice.com/a/solutions/articles/3000046274</a>

Originated: January 2021

Cabinet approval: November 22, 2021