

November 4, 2021

Background:

In September 2019, the General Counsel issued an interim policy on *Electronic Records and Privacy Access* and the interim policy was shared with the Committee on Student and Campus Community (CSCC).

Charge:

On September 18, 2019 Steering asked CSCC to read and provide comments on this policy created by the General Counsel. In addition, CSCC met with Aminah Massenburg, Privacy Officer, and Matt Cesari, Chief Information Security Officer. CSCC then sought input from the Council of Deans, Academic Leaders, Student Government, Staff Senate, Health Services, the Library and the Information Technology. CSCC then gathered input from the Faculty Senate in April 2021.

Testimony was gathered from the following groups during the 2019-2020 and 2020-2021 academic years:

- Faculty Senate
- Dean's Council
- Staff Senate
- Information Technology
- Academic Leaders
- Student Government
- Health Services
- Library

The recommendations by CSCC reflect areas of concern that were gathered during testimony.

- Clarification on access
 - Section III Permitted Access should be reviewed to define clearly who this policy covers.

- How long is the access viable? Is there a set time where access expires? There should be a review on when accessibility expires/needs to be re-administered.
- Clarification on "request access". Is the policy assuming if you have access, you don't need to request access, which does not ensure any privacy or accountability?
- Clarification on who constitutes/runs the Oversight Committee.
- Clarification on Ownership
 - "user's data" needs clarification.
 - From a user's perspective, the policy should outline whether we are notified when our data has been accessed and would like privacy protection to be extended.
- Recommend that Language needs to be changed Electronic Records Privacy and Access III, C Authorization of Access, Part 2 Staff (non-faculty) (page 4):
 - There is no Vice President of Human Resources. He retired and in June 2020 we merged the Division of Human Resources and the Division of Institutional Equity and Inclusion into a single Division of Inclusive Excellence. Who approves them now? Vice President James Felton III of Division of Inclusive Excellence, or Kimberly Woods, Associate Vice President for Strategic Human Resources?