

## CONSENT ITEM (RESOLUTION 26-08-32)

August 19, 2026

Tab 1

### Policy Manual Additions

#### Brief Description

Recent policy decisions issued by SBCTC regarding the development of a Limited Directory Information Policy, intended to support the colleges' compliance with WaTech Data Classification Policies, have necessitated an update to the State Board's Policy Manual.

#### How does this item link to the State Board's Strategic Plan?

In June 2020, the State Board adopted its strategic plan, which focuses on three goals: achieve educational equity for students who are historically underrepresented in higher education; improve completion rates; and increase access and retention among populations who can benefit the most from college access. The three goals are supported by five strategies (and associated actions) to help the system achieve those goals. Updates to the State Board's Policy Manual supports the strategic plan by providing policy guidance to the college system as they conduct their college decision-making efforts.

#### Background information and analysis

An accurate and up-to-date Policy Manual provides college and SBCTC staff with clear direction for college operations, fiscal decision-making, compliance, and supporting student access and inclusion initiatives. Recent policy decisions related to the development of a Limited Directory Information Policy, designed to align with WaTech Data Classification requirements, necessitate updates to Chapter 3 of the State Board Policy Manual. The proposed changes designate student identification numbers (EMPLIDs) and student email addresses as limited directory information and establish standards for their use, disclosure, and protection. To ensure ongoing compliance with federal and state privacy requirements, the policy also requires colleges to include the designation of limited directory information in their annual FERPA notifications to students, including descriptions of the data elements covered, the purposes for which they may be used, and the circumstances under which they may be disclosed. Communications will be distributed to the system to ensure updates are properly disseminated and available for college use. This update adds sections to Chapter 3 of the Policy Manual, as detailed in the attached materials.

#### Recommendation/preferred result

Adoption of the updated Policy Manual as proposed.

Policy Manual Change Yes ☒ No ☐

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## **STATE OF WASHINGTON STATE BOARD FOR COMMUNITY AND TECHNICAL COLLEGES RESOLUTION 26-08-32**

A resolution relating to the revision and adoption of the State Board Policy Manual

**WHEREAS**, it is important for the State Board to provide the colleges with policy guidance for operation of the colleges,

**WHEREAS**, SBCTC has created a Limited Directory Information Policy that has resulted in new and different ways of conducting business,

**WHEREAS**, a number of policy changes have occurred to the community and technical college system that have resulted in new compliance requirements,

**WHEREAS**, it was a priority to review these changes with college system groups prior to taking action,

**WHEREAS**, it was a priority that policies be provided in an accessible e-format, including links to pertinent information,

**WHEREAS**, it is important that the State Board's Policy Manual reflect the changes and communicate policies clearly to the college system and external audiences,

**THEREFORE BE IT RESOLVED**, that the State Board for Community and Technical Colleges and attached Policy Manual on August, 19 2026.

**BE IT FURTHER RESOLVED**, that the State Board for Community and Technical Colleges authorizes the Executive Director to make adjustments to this action, including any necessary changes to the State Board's Policy Manual, as necessary, for actions taken by the Governor, Legislature, data corrections, externally imposed restrictions or guidelines, uniform accounting and reporting requirements, and unanticipated changes in state or federal law.

**APPROVED AND ADOPTED** on (08/19/2026)

Attest



Nate Humphrey, Executive Director



Martin Valadez, chair

## Policy Manual – Chapter 3.30.20

### 3.30.20 Limited Directory Information

#### SBCTC Limited Directory Information

SBCTC designates student identification number (EMPLID) and student email address, including both the college-assigned email address and the student's personal email address, **as limited directory information**. Access to and disclosure of this information is restricted to Washington State Community and Technical College employees and authorized agents who require it to perform official institutional duties, including communications necessary to support student services, instruction, operations, and other legitimate educational interests.

Limited directory information is **not public directory information** and must not be released to the general public, external parties, or any individual without a documented institutional need to know, unless otherwise permitted by law or authorized by the student in writing.

Disclosure of limited directory information is permitted only when:

- The recipient is a student, college or SBCTC employee, contractor, or authorized agent acting within the scope of assigned responsibilities;
- The information is needed to carry out an official institutional function; and
- The disclosure is consistent with FERPA and institutional privacy and security requirements.

SBCTC and its colleges will not treat EMPLID or student email address as publicly releasable information and must apply appropriate administrative, technical, and physical safeguards to protect this information from unauthorized access, use, or disclosure.

In accordance with FERPA annual notification requirements, SBCTC and its colleges must identify this category of limited directory information in the annual notice of student rights and institutional privacy practices provided to students. The notice must clearly describe:

- The data elements designated as limited directory information;
- The purposes for which they may be used;
- The parties to whom they may be disclosed; and
- Any applicable student rights related to disclosure and privacy protections.

A student's request to restrict disclosure of directory information (FERPA block) does not prohibit internal institutional use or disclosure of EMPLID when such use is necessary to carry out official college or SBCTC functions and is otherwise permitted under FERPA, including disclosures to school officials with legitimate educational interests.