#### JUNE 27, 2022

# SUBJECT: CTCLINK DATA USAGE & PRIVACY AGREEMENT: EMPLOYEE ATTESTATION IMPLEMENTATION

Good afternoon:

You may recall conversations about ctcLink data privacy and the obligation of employees to maintain privacy of student and employee records. Since that time, a new ctcLink Employee Data Privacy and Usage Agreement solution was developed, approved, and tested.

A pop-up employee attestation form is scheduled to be implemented into ctcLink on the evening of July 7, 2022. Complete details are below.

# Background

While a centralized administrative system brings many benefits, it also presents data privacy concerns. ctcLink— PeopleSoft Campus Solutions, Human Capital Management, and Finance — integrates all Washington state community and technical college data (student, employee, fiscal) in a single database.

Data centralization compelled policies and procedures concerning data privacy and usage be put in place; especially for student privacy under the Family Educational Rights and Privacy Act (FERPA) which prevents access to student data by external entities unless permitted by a FERPA exemption.

To address data privacy and ensure confidentiality, the Data Governance Committee worked with the college system's assistant attorney general to implement a system-wide <u>ctcLink Employee Data Privacy</u> <u>Memorandum of Understanding (MOU)</u>.

To support the ctcLink Employee Data Privacy MOU, the Data Governance Committee developed a <u>ctcLink</u> <u>Employee Data Privacy and Usage Agreement</u> requiring employees to attest they agree to keep data private and use it only in the course of their job duties.

In September 2021, the ctcLink Working Group approved a recommendation (Log #123) to implement a pop-up online form in ctcLink as a mechanism to:

- a) Inform staff of the required and ethical use of data collected in ctcLink, and;
- b) Collect employee attestations to the Data Usage and Privacy Agreement

In January 2022, the Washington Association of Community and Technical Colleges (WACTC) approved the Data Governance Committee's proposed ctcLink Employee Data Privacy MOU, ctcLink Data Usage and Privacy Agreement, and pop-up form to collect employee attestations.

The Memorandum of Understanding, Data Usage and Privacy Statement are available on the <u>ctcLink Data</u> <u>Usage and Privacy</u> web page.

# What does this mean to employees?

The MOU and agreement apply to all college and SBCTC agency employees using ctcLink.

Employee attestations to the new Data Usage and Privacy Statement will be collected through a pop-up form presented to employee users upon ctcLink Portal login and annually thereafter.

At ctcLink login, you will be presented a form displaying the Data Usage and Privacy Agreement.

After you attest that you agree, you will continue the usual ctcLink login process. Agreeing to this statement does not alter access or security in any way.

• If the user does not attest to the agreement, they may click "Skip for Now" and continue with the

login process.

• Users will be allowed a maximum of five skips before the "Skip for Now" functionality is disabled; at which point, the user must select "I Agree" to proceed with the login.

The pop-up form will present to the user annually on the anniversary of first agreement.

#### How will employee attestation be monitored?

Each employee's EMPLID and date of agreement will be stored in a custom table and accessed through a PS Query.

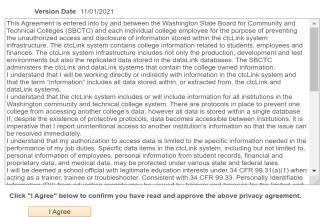
College HR and ctcLink Security administrators can identify which employees have or have not agreed to the Data Usage and Privacy Statement with an HCM Peoplesoft query:

- QHC\_HR\_EE\_DATA\_PRIV\_EMAIL\_SUPR
- This query includes a list of all active employees, including the date the employee last logged into ctcLink and the date they acknowledged the agreement. The date will be blank if they have not yet agreed to the Data Usage and Privacy Statement.

### What will the pop-up form look like?

The online form will include the text of the ctcLink Employee Data Privacy and Usage Agreement with buttons to click to attest "I Agree" or to "Skip for Now."

Read the entire privacy agreement: ctcLink Employee Data Privacy and Usage Agreement



Skip For Now

Please reach out if you have questions.

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