Section 700 - Information Systems and Services

Policy 701 - Acceptable Use of Information Systems and Services

Lower Columbia College Information Systems and Services include, but are not limited to, all local and wide area networks, Internet access, electronic publishing systems, lowercolumbia.edu, e-mail systems, administrative data processing systems, desktop computers, student labs, telephone systems, video systems, and all other current or future information systems.

The purpose of this policy is to protect the integrity and usability of College information systems and services and to ensure their continued availability for student learning and conduct of college business. This policy applies to all users of any of the College’s information systems or services.

Users of any of the College’s information systems or services agree to comply with applicable state, federal, and local laws, WAC code, and college policies and procedures.

Historic Information

- Approved: March 16, 2022
- Campus Review: February 22-March 8, 2022
- Reviewed by UMCC: February 15, 2022
- Reviewed by Governance Council: February 2, 2022
- Reviewed by the Executive Leadership Team: January 26, 2022
- Approved February 23, 2009
- Campus Review: February 1-22, 2009
- Reviewed by the Executive Leadership Team: November 2008
- Adopted : February 2008

Resource/Reference/ Procedure	Title	Unit Responsibility
Procedure 701.1A (lowercolumbia.edu/publications/administrative-policies/_assets/documents/701.1A_Employee_Acceptable_Use.docx.pdf)	Information System and Services – Employee Acceptable Use	VP Administration/Director of Information Services
Procedure 701.2A (lowercolumbia.edu/publications/administrative-policies/_a	LCC Student Text Messaging	VP Student Services

Resource/Reference/ Procedure	Title	Unit Responsibility
ssets/documents/701.2_LCC_Student_Text_Messaging.docx.pdf)		
RCW 42.52.160(3) (apps.leg.wa.gov/RCW/default.aspx?cite=42.52)	Ethics in Public Service	

Policy 705 - E-Mail Retention

This policy is intended to help employees and students of Lower Columbia College determine what information sent or received by email should be retained and for how long, and is meant to address typical records that may be contained in email and does not necessarily reference other types of records, such as paper or other types of electronic files or data. Those records are covered in depth by the State Board for Community and Technical College record retention policy.

The policy includes, but is not limited to, records that are either stored or shared via electronic mail; including instant messaging for official business.

All employees must familiarize themselves with this email retention policy and the specific retentions relating to their department or division. Questions about the proper classification of a specific piece of information should be addressed to the Director of Human Resources.

This email retention policy is secondary to the SBCTC retention policy; any current public record requests for specific public records; and any litigation hold notices for records in response to potential litigation. The sender is responsible for retaining emails within the College. The recipient is responsible for retaining emails that originate outside the College.

Email retention is generally subject to the following retention periods (see the State Board record retention schedule):

705.1 Transitory administrative records

Records which have no administrative, legal, fiscal, or archival requirement for their retention. These records include personal messages and announcements not related to business; information-only copies; copies of published materials; duplicate copies; preliminary drafts; internal requests for information; transmittal memos; reservations and confirmations; routine college admission letters.

- Retain until administrative need is satisfied.

705.2 Routine correspondence

Routine correspondence concerning day-to-day office administration and activities. These records include intra-agency correspondence; routine correspondence with other agencies; and correspondence with the public on routine matters. This category does not include executive level correspondence or correspondence concerning policies and procedures.

- Retain for 30 days.

705.3 Executive level documentation

These records include correspondence and memos at the executive level to and from public officials, the public, and others, concerning policy issues, concerns, actions, or issues.

- Retain for 4 years in Chief Executive's Office.

705.4 Non-executive level planning and working files

These records include project design plans, survey forms, charges, diagrams, statistics, preliminary analysis reports, research materials, drafts, and other documentation related to management studies, non-fiscal audits, surveys, and planning studies.

- Retain for 2 years in originating office or designated office.

705.5 Encrypted Communications

E-mail, and any attachments, containing confidential information shall be encrypted from the sending device to the receiving device. The ability to un-encrypt sender's message through authorized process; sending organization must be able to un-encrypt and retrieve originating version of sent message.

Encrypted communications of confidential information should be stored in a manner consistent with College policy, but in general, information should be stored in a decrypted format unless it is confidential personnel, business, protected health or financial information. Please check with the College's Information Services to obtain the appropriate licensed encryption software.

705.6 Retention Mailboxes

Employees shall retain specific types of email records with longer retention period by copying or blind copying their correspondence to the following mailboxes. After the expiration period, the records may be transferred to archives.

Retention Mailboxes:

- **Accreditation email:accreditation@lowercolumbia.edu** (retention period 6 years)
- **Alumni fundraising:Alumni@lowercolumbia.edu** (6 years after completion of project)

- **Attorney General correspondence:**Attorneygeneral@lowercolumbia.edu (6 years)
- **Audit files:**Audits@lowercolumbia.edu (3 years from completion of internal or external audit)
- **Business records and contracts:**Businessrecords@lowercolumbia.edu (6 years following termination of contract)
- **Chief Executive Officer level correspondence:**Admin@lowercolumbia.edu (4 years)
- **Facilities requests:**Facilitiesuse@lowercolumbia.edu (date of approval/non-approval plus 1 year)
- **Formal student complaints:**Studentcomplaints@lowercolumbia.edu (1 year following disposition of complaint)
- **Legal issues:**Legalissues@lowercolumbia.edu (6 years, then archive)
- **Legislative contacts and lobbying:**Legislative@lowercolumbia.edu (End of session plus 4 years)
- **Newsletters:**Newsletters@lowercolumbia.edu (2 years)
- **Personnel records:**Personnel@lowercolumbia.edu (up to 6 years after termination of employment)
- **Planning and working files:** (administrative level) Planningfiles@lowercolumbia.edu (2 years)
- **Policies and procedures:**Policies@lowercolumbia.edu (6 years or until superseded)
- **Public disclosure requests and responses:**Publicrecordrequests@lowercolumbia.edu (final disposition plus 1 year)
- **Public information requests and responses:**Publicinformationrequests@lowercolumbia.edu (response plus 1 year)
- **Rule making correspondence:**Rulemaking@lowercolumbia.edu (until superseded plus 6 years)
- **Student government agenda and minutes:**ASG@lowercolumbia.edu (3 years then archive)
- **Student clubs agenda and minutes:**Studentclubs@lowercolumbia.edu (3 years then archive)

Historic Information

- Adopted - November 30, 2009
- Reviewed by the Cabinet and Leadership Team - May 2009
- Campus Review - October 26 - November 6, 2009

Resource/Reference/ Procedure	Title	Unit Responsibility
Procedure 705.1 (services4.lowercolumbia.edu/info/webresources/internal/policies/705.1A%20Procedure.pdf)	E-Mail Retention Procedures	VP Administration/Director of Information Services
SBCTC Policy Manual: Chapter 7 - Public Information and Public Records (www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-7.aspx)	State Board for Community and Technical Colleges (SBCTC)	

Policy 720 - Accessible Technology Policy

Lower Columbia College provides equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. Equal opportunity includes appropriate and effective access to technology for students, employees, and community members.

This policy applies to the procurement, development and implementation of instructional, administrative, and communications technologies and content, unless it creates an undue burden on the college. It encompasses, but is not limited to, college websites, learning management tools, student information systems, training materials, instructional materials and assessment tools.

Ensuring equal and effective electronic and information technology access is the responsibility of all college administrators, faculty, and staff.

Historic Information

- Adopted - May 22, 2017

Resource/Reference/ Procedure	Title	Unit Responsibility
Procedure 720.1A (services4.lowercolumbia.edu/info/webResources2/internal/Policy/720.1A%20Proced	Posting Documents to the Website	VP of Student Services

Resource/Reference/ Procedure	Title	Unit Responsibility
ure%20for%20posting%20Documents%20%20and%20Forms%20to%20Web.pdf)		
Procedure 720.2A (services4.lowercolumbia.edu/info/webResources2/Internal/Policy/720.2Aaccessibility-procedures-procurement.pdf)	Accessible Technology Procurement Procedure	Director of Information Technology Services
WA RCW 28B.10.912 (apps.leg.wa.gov/rCW/default.aspx?cite=28B.10.912)	Students with disabilities	
WA RCW 49.60 (apps.leg.wa.gov/rcw/default.aspx?cite=49.60)	Discrimination-Human Rights Commission	
WA OCIO Policy 101 (ocio.wa.gov/policy/technology-policies-and-standards)	Technology Policies and Standards	
WA OCIO Policy 188 (ocio.wa.gov/policy/accessibility)	Accessibility	
SBCTC Policy 3.20.30b (www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-3.aspx)	SBCTC Accessible Technology	
Americans with Disabilities Act of 1990 (ADA) (www.ada.gov/)	Americans with Disabilities Act of 1990 (ADA)	
Amendments Act of 2008 (www.eeoc.gov/statutes/ada-amendments-act-2008)	Amendments Act of 2008	
Section 504 of the Rehabilitation Act of 1973 (www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-504-rehabilitation-act-of-1973)	Section 504 of the Rehabilitation Act of 1973	

Resource/Reference/ Procedure	Title	Unit Responsibility
Section 508 of the 1973 Rehabilitation Act (www.section508.gov/manage/laws-and-policies)	Section 508 of the 1973 Rehabilitation Act	
WCAG 2.1 Level AA (www.w3.org/TR/WCAG21/)	Web Content Accessibility Guidelines	

Policy 725 - Use of Electronic Signatures and Submission

This policy is designed to provide reasonable assurance for the integrity, authenticity, and nonrepudiation of electronic documents when electronic signatures and submissions are used and accepted; and to promote the use of electronic signatures and submissions throughout Lower Columbia College (LCC).

This policy and its procedures apply to all LCC employees participating in the approval, selection, acquisition, and implementation of an electronic signature solution.

725.1 Background

The use of electronic records and electronic signatures can significantly reduce costs, simplify transactions and speed up transaction time. Lower Columbia College (LCC) intends to promote electronic transactions and remove barriers that might prevent electronic transactions throughout the college. Changes to Washington law make it clear that organizations are allowed and encouraged to use and accept electronic signatures to authenticate electronic transactions. Unless otherwise specified by law, electronic signatures have the same force and effect as that of a handwritten signature.

State agencies must meet the following requirements in order to use and accept electronic signatures or electronic submissions:

State agencies are required to put in place by policy or rule, the methods and process for using or accepting electronic submissions or electronic signatures.

Electronic records and signatures must be consistent with policy, standards and guidelines provided by the state's chief information officer.

To the fullest extent allowed by law, Lower Columbia College (LCC) encourages electronic transactions and recognizes electronic records and signatures. The use and acceptance of electronic signatures and electronic submissions/records shall be consistent with the guidance and requirements put in place by the Office of the Chief Information Officer (OCIO), if any.

The Vice President of Administrative Services in consultation with the Director of IT Services and the Finance Director shall approve specific methods and processes for electronic signatures and submissions. These approval authorities may be delegated at the discretion of the VP of Administrative Services.

The approval of solutions shall be coordinated through the IT Services department. The VP of Administrative Services shall determine a suitable review and approval process to be used when determining which solution(s) are suitable for a particular type of record or transaction. Where appropriate, a team approach shall be used.

Approved solutions shall be listed in the related procedures.

725.2 Definitions

Electronic Signature

An electronic signature is a sound, symbol, or process attached or associated with an electronic record and executed or adopted by a person with the intent to sign the record. The integrity and authenticity of a record with an electronic signatures needs to be preserved over time. Signatures are used when:

- required by law, or
- the significance of a transaction needs to be emphasized, or
- the transaction needs to be bound to a person

In practice, electronic signatures emphasize one or more of the following four parts:

- the identification and authentication of the signer, or
- the intent to sign, or
- the association of the signature to the record, or
- the authenticity and integrity of the record

Authentication

The assurance that an electronic signature is that of the person purporting to sign a record or otherwise conducting an electronic transaction.

Authorization

When an individual has both verified permission and the requisite authority to sign a record, access specific college services, or perform certain operations, including executing binding agreements.

Electronic Record

A record created, generated, communicated, sent, received, or stored by electronic means.

Nonrepudiation

Nonrepudiation is the assurance that someone cannot deny something. Typically, nonrepudiation refers to the ability to ensure that a party to a contract or a communication cannot deny the authenticity of their signature on a document or the sending of a message that they originated.

Record Integrity

Integrity refers to the assurance that a record is preserved without any alteration that would impair its use as an authentic record. Both accuracy and the completeness of the electronic record must be preserved.

Click Through or Click Wrap

In this type of electronic signature, a signer is asked to affirm his or her intent or agreement by checking a box or clicking a button. The Click Through/Click Wrap approach is commonly used for low risk, low value consumer transactions.

Password or Personal Identification Number (PIN)

When using a password or PIN for an e-signature, a person is required to enter identifying information, which may include an identification number, the person's name and a "shared secret" such as a PIN or password. A password/PIN is more secure than the click through/click wrap method.

Digitized Signature

A digitized signature is a graphical image of a handwritten signature. This approach may use specialized hardware or software for additional security. A digitized signature is more secure than the password/PIN method.

Digital Signatures

A "digital signature" is created when the signer uses a private signing key to create a unique mark (called a "signed hash") on an electronic document. The recipient of the document uses the signer's public key to validate the authenticity of the private key and to verify that the document was not altered after signing. A digital signature is more secure than the digitized signature method.

Hybrid Approaches

Hybrid electronic signature solutions are available by combining techniques from various approaches to provide increased security, authentication, record integrity and non-repudiation.

Historic Information

- Reviewed by the Cabinet - November 2017
- Reviewed by Governance Council - December 6, 2017
  - (Recommended taking to UMCC and Operations Council, then proceed with campus review)
- Reviewed by Operations Council - December 11, 2017
- Reviewed by UMCC - January 16, 2018

- Campus Review - January 18 - February 2, 2018
- Governance Council Review - February 7, 2018
- Approved by the Executive Leadership Team - February 7, 2018

Resource/Reference/ Procedure	Title	Unit Responsibility
Procedure 725.1A (services4.lowercolumbia.edu/info/webResources2/internal/Policy/725.1A%20Procedure-%20eSignatures%20and%20submissions.pdf)	Use of Electronic Signatures and Submission Procedures	VP Administration and Director of Information Technology Services
Electronic Signatures in Global and National Commerce Act (www.fdic.gov/regulations/compliance/manual/10/x-3.1.pdf)	E-Sign Act	
Title IV of the Higher Education Act of 1965 (www2.ed.gov/policy/highered/reg/hearulemaking/2018/reghistory.pdf)	Higher Education Act	
Standards for Electronic Signatures in Electronic Student Loan Transactions (ifap.ed.gov/sites/default/files/attachments/dpcletters/gen0106Arevised.pdf)	US Dept. of Education	
Washington DES Laws, Rules, and Policies website (des.wa.gov/about/policies-laws-rules)		
Washington OCIO Electronic Signature Guidelines (ocio.wa.gov/policy/electronic-signature-guidelines)		
RCA 1.80 Uniform Electronic Transactions Act (app.leg.wa.gov/RCW		

Resource/Reference/ Procedure	Title	Unit Responsibility
/default.aspx?cite=1.80&full=true)		

Policy 730 - Data Governance Policy

College data are assets maintained to support the mission and vision of Lower Columbia College (LCC). The Data Governance Policy formalizes the process for managing the availability, consistency, integrity, quality, security, and usability of information. Appropriate governance for the management and use of data ensures institutional capacity for making data-informed decisions as well as the legal, ethical, and strategic use of data resources, all of which are critical to the college's operations and planning priorities.

Description

“College data” refers to any data elements relevant to the operations, planning, and management priorities of Lower Columbia College. This includes data used in official college, administrative, or compliance reports. To support effective management and data-informed decisions, college data must be accessible, relevant, accurate, and reliable.

Governance

Lower Columbia College's Data Governance Committee has the responsibility for managing and maintaining standards for college data. The mission of the Data Governance Committee is to support the accuracy and validity of data collection, reporting, and analysis at Lower Columbia College and to provide guidance for maintaining the confidentiality, integrity, and availability of data throughout its life cycle. This includes, but is not limited to, developing related policies, procedures and standards; resolving data conflicts; evaluating staff requests for access to information; promoting data security; developing common data definitions and standards for use; facilitating communication among data users; encouraging best practices; and ensuring that all legal and regulatory requirements regarding the collection, use, storage, release, retention, and destruction of data are met. The committee will oversee the following components of data management:

- Data access
- Data classification
- Data compliance and regulatory control
- Data security
- Data storage
- Meta-data management

Historic Information

- Adopted 1-22-20

Resources/Reference/ Procedure	Title (if applicable)	Unit Responsibility
LCC Committees/ Governance (internal.lowercolumbia.edu/organization/committees/data-governance)	Data Governance Committee	VP of ECR and Director of IT
SBCTC Data Governance (www.sbctc.edu/colleges-staff/commissions-councils/dgc/default.aspx)	College Resources	VP of ECR and Director of IT