

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 [ctcLink Employee Data Privacy Memorandum of Understanding \(MOU\)](#).

To support the ctcLink Employee Data Privacy MOU, the Data Governance Committee developed a [ctcLink Employee Data Privacy and Usage Agreement](#) 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 [ctcLink Data Usage and Privacy](#) 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](#)

Version Date 11/01/2021

This Agreement is entered into by and between the Washington State Board for Community and Technical Colleges (SBCTC) and each individual college employee for the purpose of preventing the unauthorized access and disclosure of information stored within the ctclink system infrastructure. The ctclink system contains college information related to students, employees and finances. The ctclink system infrastructure includes not only the production, development and test environments but also the replicated data stored in the dataLink databases. The SBCTC administers the ctclink and dataLink systems that contain the college owned information. I understand that I will be working directly or indirectly with information in the ctclink system and that the term “information” includes all data stored within, or extracted from, the ctclink and dataLink systems.

I understand that the ctclink system includes or will include information for all institutions in the Washington community and technical college system. There are protocols in place to prevent one college from accessing another college’s data, however all data is stored within a single database. If, despite the existence of protective protocols, data becomes accessible between institutions, it is imperative that I report unintentional access to another institution’s information so that the issue can be resolved immediately.

I understand that my authorization to access data is limited to the specific information needed in the performance of my job duties. Specific data items in the ctclink system, including but not limited to, personal information of employees, personal information from student records, financial and proprietary data, and medical data, may be protected under various state and federal laws.

I will be deemed a school official with legitimate education interests under 34 CFR 99.31(a)(1) when acting as a trainer, trainee or troubleshooter. Consistent with 34 CFR 99.33, Personally Identifiable Information (PII) will be protected.

Click “I Agree” below to confirm you have read and approve the above privacy agreement.

Please reach out if you have questions.

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