

POLICY CONCEPTS: INSTRUCTIONS AND GUIDELINES

All policy proposals – including new policy concepts, proposed revisions, or suggested repeals – must be submitted via the form on page 2 to the Office of the University Secretary with appropriate supporting information and documents. Completed submissions are forwarded to the University Senate (academic policies) or the President's Policy Advisory Council (PAC), which ensures proper routing through the policy-making process. (See UO Policy I.03.01 for more information.)

Please keep the following definition of a university policy in mind as you develop your concept:

A University Policy ("Policy") is a policy that (1) has broad application or impact throughout the University community, (2) must be implemented to ensure compliance with state or federal law, (3) is necessary to enhance the University's mission, to ensure institutional consistency and operational efficiency, or to mitigate institutional risks; or (4) is otherwise designated by the Board [of Trustees] or the President [of the University] as a University Policy.

A policy establishes rights, requirements or responsibilities. Excluded from this definition are things such as, but not limited to, implementation guides, operating guidelines, internal procedures, and similar management controls and tools.

To help facilitate as smooth a process as possible, please consider the following:

1. Consult as many stakeholders as possible *prior to submitting* your concept. A primary role for the PAC is to ensure that appropriate offices, departments or groups are consulted.
2. Run your concept by the Office of General Counsel (OGC) *prior to submission*. OGC review is a required step in policy-making.
3. Please use the proper template – email uopolicy@uoregon.edu to obtain either (a) the new policy template (new proposals) or (b) the Word version of the existing policy in its proper template (for redlines/revisions).
4. A "redlined" version of your concept in Word is required for proposed revisions. This must be done using the appropriate Word version (see #3, above).
5. Include any appropriate related resources that will be useful to those reviewing the concept. Links are preferred, but supplemental documents are of course acceptable for items not online. Examples of such items include any associated procedures or unit level policies (even if in draft form), or other policies or procedures related to, overridden by, necessary as a result of, or otherwise affiliated with your concept;
6. Please submit all documents as individual files.
7. Someone from the responsible office or proposing unit will need to attend a PAC meeting to explain the concept and answer any questions.

Please email uopolicy@uoregon.edu if you have any questions. Thank you!

POLICY CONCEPT FORM

Name and UO Title/Affiliation:	José A. Domínguez, Chief Information Security Officer
Policy Title & # (if applicable):	Privacy Policy
Submitted on Behalf Of:	Self
Responsible Executive Officer:	Jammie Moffitt, Senior Vice President for Finance and Administration/CFO

SELECT ONE: ☒ **New Policy** ☐ **Revision** ☐ **Repeal**

Click the box to select

HAS THE OFFICE OF GENERAL COUNSEL REVIEWED THIS CONCEPT: ☒ **Yes** ☐ **No**

If yes, which attorney(s): Ryan Hagemann, Jessica Price

GENERAL SUBJECT MATTER

Include the policy name and number of any existing policies associated with this concept.

Here are several policies that cover some elements of privacy for data the university collects and manages:

Student Records – III.05.03

University Records Management – IV.10.01

Faculty Records Policy – OAR 571.030

RELATED STATUTES, REGULATIONS, POLICIES, ETC.

List known statutes, regulations, policies (including unit level policies), or similar related to or impacted by the concept. Include hyperlinks where possible, excerpts when practical (e.g. a short statute), or attachments if necessary. Examples: statute that negates the need for or requires updates to an existing policy; unit level policy(ies) proposed for University-wide enactment; or existing policies used in a new, merged and updated policy.

The following is a list of external statutes and regulations that call for or make references to expectation of privacy for personally identifiable information:

- Family Educational Rights and Privacy Act (FERPA) – <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- Health Insurance Portability and Accountability Act (HIPAA) – <https://www.hhs.gov/hipaa/index.html>
- General Data Protection Regulation (GDPR) – <https://gdpr-info.eu/>
- Oregon Public Records Law – <https://www.doj.state.or.us/oregon-department-of-justice/public-records/attorney-generals-public-records-and-meetings-manual/i-public-records/>
- Oregon Consumer Privacy Act – <https://olis.oregonlegislature.gov/liz/2023R1/Downloads/MeasureDocument/SB619/Enrolled>

STATEMENT OF NEED

What does this concept accomplish and why is it necessary?

Protection of personal and institutional information is critical to maintain the university's operational and social responsibility reputation in addition to compliance adherence to many of the regulatory requirements that apply to the University of Oregon.

Today, the university web templates have a PRIVACY POLICY entry that points to our student records privacy policy published by the University Registrar in accordance with the Student Records policy. That particular statement only applies to student information and does not apply to all data collected and managed by the University.

This policy is the result of work performed by the SERMC privacy working group. During the discovery phaser, we observed that in the absence of a university-wide privacy policy and policy notice, many web sites have created and published their own privacy policy and notice statements. This new privacy policy and the accompanying privacy notice will serve as the baseline to be used by all university entities in the absence of a more stringent privacy policy and privacy notice, as those required by regulatory or contractual requirements.

AFFECTED PARTIES

Who is impacted by this change, and how?

This policy applies to the university as an enterprise, including but not limited to all university offices, units, and departments that collect, store, use, disclose or manage data related to UO employees, students, alumni, retirees, volunteers, visitors, contractors, vendors, customers, certain third parties, and research subjects.

CONSULTED STAKEHOLDERS

Which offices/departments have reviewed your concept and are they confirmed as supportive? (Please do not provide a list of every individual consulted. Remain focused on stakeholders (e.g. ASUO, Office of the Provost, Registrar, Title IX Coordinator, etc.).)

Name	Office	Date
SEE APPENDIX A FOR LIST OF STAKEHOLDERS CONSULTED. WHEN SEVERAL INDIVIDUALS WERE CONSULTED, THE WORD "MULTIPLE" WAS USED UNDER THE NAME HEADING.		

APPENDIX A – STAKEHOLDERS CONSULTED

Name	Office	Date Contacted
Tim Inman	Board of Trustees	5-Oct-2023
Multiple	Business Affairs	13-Mar-2023
Carol Stabile	Clark Honors College	14-Mar-2023
Multiple	College of Arts & Sciences	14-Mar-2023
Adrian Parr	College of Design	14-Mar-2023
Laura Lee McIntyre	College of Education	14-Mar-2023
Kathie Stanley	Division of Student Life	10-Mar-2023
Multiple	Finance & Administration	10-Mar-2023
Multiple	Financial Aid & Scholarships	13-Mar-2023
Krista Chronister	Graduate School	14-Mar-2023
Multiple	Human Resources	10-Mar-2023
Multiple	Information Services	1-Mar-2023
J P Monroe	Institutional Research	13-Mar-2023
Multiple	Intercollegiate Athletics	10-Mar-2023
Moira Kiltie	Knight Campus for Accelerating Scientific Impact	10-Mar-2023
Marcilynn Burke	Law School	14-Mar-2023
Bruce Blonigen	Lundquist College of Business	14-Mar-2023
Multiple	Office of Admissions	13-Mar-2023
Ryan Hagemann and others	Office of General Counsel	10-Mar-2023
Multiple	Office of Internal Audit	13-Mar-2023
Multiple	Office of Research and Innovation	10-Mar-2023
Multiple	Office of the Provost	13-Mar-2023
Multiple	Office of the Registrar	13-Mar-2023
Kassy Fisher	President's Office	10-Mar-2023
Mahnaz Ghaznavi	Public Records Office	14-Mar-2023
Multiple	Safety & Risk Services	14-Mar-2023
Sabrina Madison-Cannon	School of Music and Dance	14-Mar-2023
Juan-Carlos Molleda	Schools of Journalism & Communication	14-Mar-2023
Anna Schmidt-MacKenzie	Student Services & Enrollment Management	10-Mar-2023
Kimberly Johnson	Undergraduate Education and Student Success	14-Mar-2023
Multiple	University Advancement	10-Mar-2023
Multiple	University Communications	10-Mar-2023
Multiple	University Faculty Senate	13-Mar-2023
Multiple	University Faculty Senate	13-Mar-2023
Multiple	University Health Services	13-Mar-2023
Michael Griffel	University Housing	23-Mar-2023

Multiple	University Libraries	13-Mar-2023
Multiple	VP for Equity & Inclusion	10-Mar-2023



Policy Concept Form

As part of the University of Oregon Policy development process, all new Policy proposals, as well as proposals for the revision or repeal of existing Policies, must be submitted via this form to the University Secretary (the policy custodian). The Secretary will forward completed concept forms to the President's Policy Advisory Council for consideration pursuant to the University's Policy on University Policies. Please remember:

A "Policy" as defined by the University Policy on Policies (1) has broad application or impact throughout the University community, (2) must be implemented to ensure compliance with state or federal law, (3) is necessary to enhance the University's mission, to ensure institutional consistency and operational efficiency, or to mitigate institutional risks; or (4) is otherwise designated by the Board or the President as a University Policy subject to the Policy-Making Process authorized in Section 4. A policy establishes rights, requirements or responsibilities. Excluded from this definition are things such as, but not limited to, implementation guides, operating guidelines, internal procedures, and similar management controls and tools.

[Complete the following information as thoroughly as possible; response boxes will expand as filled.]

CONCEPT SUBMITTED BY:

NAME:	
PHONE:	
EMAIL:	
ORGANIZATION:	

POLICY CONCEPT SUBJECT MATTER (including existing policy number if appropriate):

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STATEMENT OF NEED FOR THIS POLICY CONCEPT (i.e. What is the problem this concept seeks to address, and how does this proposal do so?):

WHO OR WHAT MIGHT BE AFFECTED BY THIS POLICY CONCEPT, AND HOW? *List all individuals, groups, etc. that would be impacted by this concept and the nature of any possible impacts (both positive and negative).*

WHAT COSTS MIGHT BE ASSOCIATED WITH THIS CONCEPT, BOTH IMPLEMENTATION AND RECURRING?

WHAT OTHER RESOURCES (HUMAN, PHYSICAL, OPERATIONAL, FINANCIAL, TECHNOLOGICAL, ETC.), WILL BE NEEDED TO IMPLEMENT AND MAINTAIN COMPLIANCE WITH THIS POLICY?

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DOES THE PROPOSED CONCEPT IMPACT EXISTING POLICIES, GUIDELINES OR PROCEDURES? DOES THE PROPOSED CONCEPT RELATE TO A MATTER WITHIN A UNION CONTRACT? IF SO, PLEASE LIST.

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ADDITIONAL INFORMATION YOU WISH TO SHARE?

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PLEASE PROVIDE ANY SUGGESTED LANGUAGE AS AN ATTACHMENT TO THIS FORM.

FOR OFFICE USE ONLY
Date Received: