

## Policies and Procedures

Proposed Policy Number and Title: 116 Student Communications				
Existing Policy Nu	umber and Title:	Not applicable	ot applicable	
Approval Process*				
⊠ Regular	☐ Temporary	☐ Non-Substantive Change	☐ Compliance Change	
⊠ New	□ New	☐ Revision–Limited-Scope	☐ Revision—Limited-Scope	
☐ Revision	☐ Revision		☐ Deletion	
☐ Deletion	☐ Suspension		5.00	
	*See UVU Policy 101 Po	olicy Governing Policies for proce	ess details.	
Draft Number an	d Date: Stage 4 Bo	oard of Trustees Draft	/	
President's Coun	cil Sponsor: Mich	elle Kearns	Ext.	
Policy Steward:	Derek Kent	2.()	<b>Ext.</b>	
	POLICY AP	PROVAL PROCESS DAT	ES	
Policy Drafting a	nd Revision	V	OVAL PROCESS	
Entrance Date:	01/12/23	Verify:		
University Entities Review		☐ Policy Number		
Entrance Date:	3/28/24	☐ Section☐ Title		
Close Feedback:	9/27/24	☐ BOT approval		
<b>University Comm</b>	unity Review	☐ Approval date		
Entrance Date:	12/12/2024	☐ Effective date		
Open Feedback:		ı — ·	Policy Manual posting	
Close Feedback:		☐ TOPS Pipeline an	d Archives update	
Close I cedoack.		Policy Office personne	l who verified and posted	
<b>Board of Trustees</b>	s Review	this policy to the Unive	-	
Entrance Date:	01/09/2025	Name:		
Approval Date: Date posted and verified:				



#### Policies and Procedures

POLICY TITLE	Student Communications	Policy Number	116
Section	Governance, Organization, and General	Approval	
Section	Information	Date	
Subsection	Gayamana and Organization	Effective	
Subsection	Governance and Organization	Date	
Responsible	Office of the Vice President of Student	Last Review	
Office	Affairs	Last Keview	

#### 1.0 PURPOSE

- 1.1 This policy establishes best practices for electronic mass communications to UVU students,
- 2 to ensure compliance with FERPA regulations and UVU policies, and to preserve the value and
- 3 integrity of student communications.

#### 2.0 REFERENCES

- 4 **2.1** Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g
- 5 **2.2** Telephone Consumer Protection Act, 47 U.S.C. § 227
- 6 2.3 Government Records Access and Management Act, Utah Code Ann. § 63G-2
- 7 **2.4** Utah Board of Higher EducationSHE R840 Institutional Business Communications
- 8 **2.5** UVU Policy 112 Use of University Social Media
- 9 **2.6** UVU Policy 138 Institutional Review Board
- 10 2.62.7 UVU Policy 445 Institutional Data Management and Access
- 11 2.72.8 UVU Policy 542 FERPA (Students Records Privacy)

#### 3.0 DEFINITIONS

- 12 **3.1 Directory information:** Student education record information identified by UVU Policy 542
- that can be released without the student's written consent.
- 14 3.2 Electronic messaging systems: Messaging technology or methods for personal
- 15 communications. These may include but are not limited to instant, email, web, mobile, or app
- 16 messaging technology.



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- 17 **3.3 Enterprise email:** The email system the University uses to engage in official business. This
- includes but is not limited to addresses using the @uvu.edu domain. Enterprise email service
- does not include any separate, affiliated email services that the University offers to alumni or
- 20 other groups.
- 21 **3.4 Mass communication:** A message sent to multiple students at the same time that has
- 22 identical, or nearly identical, messaging. For the purposes of this policy, these communications
- 23 may be distributed via email or text messaging.
- 24 3.5 Opt-in messaging: Messages where recipients have indicated an interest in and willingness
- 25 to receive communications.
- 26 **3.6 Opt-out messaging:** Messages sent by university offices or departments where it is
- 27 presumed that students have agreed to receive the messages when they are admitted and enrolled.
- 28 3.7 Registered student: A student registered for at least one class in the current or upcoming
- 29 term.
- 30 3.8 Required messaging: Communications that must be sent to students for compliance with
- federal, state, or local regulations or campus policies. Students cannot opt out of these
- 32 communications.
- 33 **3.9 Sender:** For the purposes of this policy, a university entity, department, or employee
- authorized to send mass communications to students.
- 35 3.10 Student Communication Governance Council (SCGC): Advisory committee composed
- of representatives from divisions involved in student communications. This group guides and
- 37 assesses communication needs and efforts from the University to students.
- 38 3.11 University electronic communications: Any electronic communication that an employee,
- trustee, volunteer, or other designated individual sends or receives as part of their responsibilities
- at the University.

#### **4.0 POLICY**

- 4.1 Scope of Policy
- 4.1.1 This policy applies only to university mass communications sent to registered students via
- email and text messaging. It is not intended to direct or restrict classroom communications
- between faculty and their students. Other forms of mass communication, including emergency
- communications or those required by state or federal law, are not addressed in this policy.



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#### 46 **4.2 Policy Statement**

4.2.1 Senders must follow the best practices and standards for emailing and texting at UVU,
 including those documented in the *Student Communication Guidelines*, which can be found on
 the employee intranet.

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**4.2.2** Senders shall adhere to FERPA regulations and institutional policies to protect the privacy of students' personally identifiable information and education records.

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- 4.2.3 Senders are responsible for obtaining the required approvals or consent through the
   procedures established in this policy before distributing any non-required email or text messages.
- 4.2.4 Senders who fail to comply with these standards may have their access to certain tools
   and/or information revoked or be subject to appropriate disciplinary action. The Student
   Communication Governance Council will review and approve or disapprove requests to reinstate
- 59 access to tools. The sender's first-level supervisor may appeal the SCGC's decision to
- 60 <u>disapprove reinstatement</u>.

#### 4.3 Student Communication Governance Council

- 4.3.1 The Student Communication Governance Council (SCGC) is responsible for creating and maintaining rules and guidelines for communicating with students. The council assesses and
- 64 gives feedback on the current state of student communication to improve systems and processes.
- 4.3.2 The SCGC is chaired by a representative from Student Affairs and is comprised of
- 66 representatives from areas across campus, including Athletics, Digital Transformation, Academic
- 67 Affairs, Student Affairs, and Marketing and Communications.

## 4.4 Responsibilities of Senders

- 69 **4.4.1** Senders are responsible for obtaining all required university approvals from their
- 70 corresponding first-level executives, such as assistant vice presidents or deans, before sending
- any mass communications. First-level executives should review these requests to ensure they
- address a need, are consistent with university messaging, and clearly identify which university
- entity owns the content.
- 74 **4.4.2** When required, sSenders are responsible for obtaining students' consent to receive
- 75 communications and maintaining records of the opt-in and opt-out responses <u>for text messages</u>
- and non-required emails.
- 77 <u>4.4.3</u> Senders shall maintain and secure all student information they obtain for communications
- (see section 5.3). They The sender shall also use the student information only for the purpose for
- which it was obtained.



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80 81 82	4.4.34.4.4 Senders are responsible for obtaining all other approvals necessary for their intended communications; for example, senders seeking to conduct research or survey students should ensure their project has received IRB approval per Policy 138 <i>Institutional Review Board</i> . Areas
83	including students in research are responsible for requesting a contact list from BIRS.
84	4.5 Exemptions for Gaining Approval
85 86 87 88 89	<b>4.5.1</b> The offices and organizations listed in the <i>Student Communication Guidelines</i> do not need approval for their communications when the messages are required under their stewardship or specific job functions. Other offices and organizations listed in the guidelines that are responsible for contacting individual students about their academic, mental, or physical well-being are also exempt.
90 91	<b>4.5.2</b> Division representatives must ask the Student Governance Council for any additional exceptions.
92	4.6 Impermissible Mass Communications
93 94	<b>4.6.1</b> The following communications are not permitted as unsolicited, mass communications <u>via</u> <u>texting or email</u> :
95 96 97	1) Promotions for individual events or activities that do not have approval of a first-level executive. Senders should use the campus events promotion systems and other best practices including social media and digital signage to promote events.
98 99	2) Sending student surveys or research requests Research requests with student participants or respondents that have not received IRB approval.
100 101 102	3) Surveys with more than 500 student participants or respondents that are determined to not need IRB approval. These surveys shall be coordinated with UVU's Office of Institutional Engagement and Effectiveness.
103	4) Canvassing Solicitations or campaigns for personal, business, or political purposes.
104	4.7 Permitted Email Communication
105 106 107	4.7.1 All university email communications must be sent through the official UVU enterprise, not personal, email accounts for both senders and registered students, unless otherwise approved by the appropriate first-level executive.

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4.7.14.7.2 Any out\_reach that may require the use of personal or preferred email addresses must be approved by the first-level executive and must contain only directory or general institutional information.

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**4.7.24.7.3** Email communications are categorized as either required, opt-out, or opt-in messaging:

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**4.7.2.14.7.3.1** Required messaging may include, but is not limited to, student account reminders, registration dates, advising outreaches, and academic deadlines. Students cannot opt out of required messaging.

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4.7.2.24.7.3.2 Opt-out messaging, as defined in section 3.7, may include but is not limited to campus or department newsletters, student research and surveys, and messaging from other campus resources.

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- 4.7.2.34.7.3.3 Opt-in messaging, as defined in <u>section</u> 3.6, may include messages from The Den,
   The Noorda Center for the Performing Arts, and other student clubs and organizations. Offices
   and organizations are responsible for maintaining a record of students who have opted in.
- 4.7.34.7.4 University areas that distribute opt-out or opt-in messaging must honor requests to unsubscribe from communications.

## 130 4.8 Permitted Text Messaging

- 4.8.1 Each sender or university area must receive <u>express</u> student <u>express</u> consent before text
- messaging students. Students should be notified of the types of texts to which they are
- consenting and must be able to unsubscribe or opt out of receiving text messages at any time.
- 134 Consent to receive messages from one area on campus does not grant consent to all other areas.
- Similarly, opting out of text messages from one university area will not opt-out a student from
- 136 receiving messages from other university areas.

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**4.8.2** Each sender or university area is responsible for maintaining a record of <u>express</u> consent received from students.

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**4.8.3** The text messages sent to a student must include the <u>U</u>university and university area's name (e.g. "UVU Admissions" or "UVU Athletics") communicate that standard data and text messaging rates may apply and tell the recipient how to opt-out or unsubscribe from future messages.

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4.8.4 Senders can use text messaging to relay critical information about cancellations, closures, admissions, academic requirements, deadlines, registration information, financial aid, and other matters that are time-sensitive and necessary for student progress. Text messages should not be the primary means of communication with students, but used as a supplemental communication tool. Text messages must align with the department or area communication plan or strategies approved by a first-level executive.

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- 4.8.5 Because text messaging is not a FERPA-compliant channel, university officials must not use text messaging to communicate personal or confidential information, including social
- security numbers, passwords, financial information, or academic information, such as student
- grades or class schedules.
- 4.8.6 Students who have invoked their right to deny the release of their directory information
- should not be communicated with via text message unless they have provided <u>direct express</u>
- 159 consent to receive messages from the sender.

#### **5.0 PROCEDURES**

## 160 **5.1 Requests for Email Communications**

- 5.1.1 Requests for email communications should state the purpose of the communication, include the email's content, and identify a specific, targeted audience. Campaigns and other email
- messages must have an intentional and clear purpose to notify, remind, or move a student to
- action. All messages should be timely, clear, and effective.

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5.1.2 Requests for email communications must identify the category in which the email falls: required, opt-out, or opt-in messaging.

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- 5.1.3 In accordance with section 4.4.2, sSenders must submit these requests to and obtain all required approval from their first-level executive.
- 171 **5.1.4** The distribution of any unsolicited mass email communication determined to be a non-
- 172 <u>required message that students have not opted into</u> must be approved in advance by the
- appropriate first-level executive. <u>Approvals may be made for stand-alone messages or for</u>
- specific communication plans such as newsletters or drip campaigns.

### 5.2 Requests for Text Communications

- 176 <u>5.2.1</u> Areas seeking approval to use UVU messaging systems to text students can complete the
- 177 request form through the Student Communication Governance Council (SCGC). This request
- must include the specific audience, the types content of messages to be sent to students, and the
- ways student information and <u>express</u> consent will be collected.



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180 181 182	<b>5.2.1</b> The SCGC will review each request and ask follow up questions as needed. This review is to ensure compliance with university policy while verifying that the area requesting access has demonstrated a need for the communication channel.
183 184 185	<b>5.2.2</b> Once the SCGC approves the request, they will connect the area representative with the vendor to establish an account and receive training on the system. Area representatives are responsible for ensuring that all current and new senders receive the appropriate training.
186	5.3 Request for Access to University Messaging Systems
187 188 189	5.3.1 The SCGC will review each request and ask follow-up questions as needed. This review is to ensure compliance with university policy while verifying that the area requesting access has demonstrated a need for the communication channel.
190 191 192	5.3.2 Once the SCGC approves the request, it will connect the area representative with the vendor to establish an account and receive training on the system. Area representatives are responsible for ensuring all current and new senders receive the appropriate training.
193 194 195 196 197 198	<b>5.3.3</b> The SCGC may deny a request if the area fails to demonstrate a clear need for the channel or fails to identify how the area will comply with the procedures within this policy and other applicable university policies, such as Policy 138 <i>Institutional Review Board</i> and Policy 542 <i>FERPA (Students Records Privacy)</i> . The SCGC may also deny requests if the University's contract with a communication platform vendor does not give the University the ability to register additional users. Areas may resubmit requests with any necessary clarifications.
199 200 201	<ul> <li>5.35.4 Maintenance and Security of Student Information</li> <li>5.3.15.4.1 Senders maintain responsibility for the proper use, care, and security of student information and contact lists.</li> </ul>
202 203 204 205 206 207	5.3.25.4.2 Student lists may not be used for any purposes other than the approved use. These lists must not be retained or repurposed outside of the parameters defined in the request. Senders with access to systems providing regularly updated lists of student information may only use the lists for their intended purposes. Lists pulled from approved systems or Business Intelligence and Research Services (BIRS) requests should not be shared with offices or individuals not involved in related communications.
208 209 210 211	5.3.35.4.3 Senders whothat do not maintain membership lists or have access to systems with regularly updated student information can submit a request for student contact information to BIRS. Requests will only be approved for a specific communication or campaign with a defined target audience.



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5.3.45.4.4 Only the offices and departments that can provide a record of students opting to receive text messages can obtain student contact information. Requests for student information for text messaging must be accompanied by evidence of <u>express</u> consent. Offices and departments are permitted to collect student phone numbers obtained by consent.

POLICY HISTORY						
Date of Last Formal	Date of Last Formal Review: Click here to enter a date.					
<b>Due Date of Next Rev</b>	view: Click here to enter a date.					
<b>Date of Last Action</b>	t Action					
	Regular policy approved	UVU Board of Trustees				

# Executive Summary: Policy 116 Institutional Messaging and Student Communication

Date: June 7, 2022
Sponsor: Dr. Kyle Reyes
Steward: Derek Kent
Policy Process: Regular
Policy Action: New

#### Issues/Concerns (including fiscal, legal, and compliance impact):

Ineffective communications can negatively impact the student experience and efforts to increase retention and graduation. Students at UVU currently receive well over 3,000 emails over an academic year from multiple sources across campus. This deluge of messages creates challenges in communicating vital information to students who begin to experience message fatigue. Addressing this issue will result in more effective communication channels, helping students receive the information they need in a timely and efficient manner. While UVU's Employee Email Guidelines identify best practices regarding employee use of email, it does not address the matter of one-to-many communications with students. There is not an established policy to define the communication channels by the University or the purposes for their use.

**Suggested Changes:** Creation of Policy 116 *Institutional Messaging and Student Communication.* 

This new policy will:

- Identify and define the purpose of communication channels used by the institution to communicate with students
- Establish foundations of best practices for one-to-many communications with students.
- Provide structure and framework to implement adaptable guidelines.

#### Requested Approval from President's Council: Stage 1

**Proposed Drafting Committee:** Derek Kent, Eric Humphrey, Matt Serrao, Bonnie Rodriguez-Mortensen, Jennifer Gallagher (embedded editor), Jaden Muir (UVUSA)

Target Date for Stage 1 Draft to Enter Stage 2: 1/12/2023



## **Equity Assessment Committee (EAC) Worksheet**

**NOTE:** This form is for internal use only by the EAC and policy sponsors/stewards/coordinators. This form captures general equity concerns and those that impact the specific groups listed. The Equity Assessment Findings and Responses Summary form accompany the Stage 1 draft.

Policy Number: 116	Policy Title: Student Communications
EAC Review Date: March 22, 2024	Policy Sponsor: Michelle Kearns
Date Completed by Policy	Policy Steward: Derek Kent
Sponsor/Steward/Coordinator:	

#### **UVU Scope (Groups impacted):**

Adult learners Age (40+)

Color

First-generation student status

Individuals with apparent or non-apparent disabilities

National origin and citizenship status

Pregnancy, pregnancy-related conditions

Race and ethnicity

Religion, spirituality, and worldviews

Sex, gender identity, and gender expression

Sexual orientation Socioeconomic status

Veteran status (including uniformed military status)

Section	Groups	General	Equity Concern	Equity Recommendation	Policy Sponsor/Steward/Coordinator
	Impacted	Equity			Proposed Solution
3.1		Х	How will those who need to be trained	State in the policy what the training is, how	Removed definition, including this phrasing,
			as approved senders know about and	it is accessed, and how approved senders	because the term is redundant with the
			access any required training? Is it the	will be notified of required training.	definition for "sender" and the training is
			same or different from the vendor		explained further in 5.2.3. Added additional
			training mentioned in section 5.2.3?		detail to 5.2.3.



## POLICY APPROVAL PROCESS - STAGE 2 SUMMARY OF COMMENTS for Policy 116

Policy Title: Student Communications	Policy Number: 116	
Sponsor: Michelle Kearns	Steward: Derek Kent	

NOTE: Indicate with X whether the comment is editorial (grammar, punctuation, sentence structure, etc.) or is a substance comment (content, procedure, etc.).

CAMPUS ENTITY	POLICY SECTION	Editorial Comment?	Substance Comment?	CONCERN	SPONSOR/STEWARD RESPONSE
Faculty Senate	3.0		х	Instead of giving an example, as in line 70, we suggest that 'first-level executives' be clearly defined in section 3.0 Definitions.	Because the definition of "first-level executive" can vary widely across campus, we have chosen to keep the examples for now.
Faculty Senate	3.4 & 4.1.1		Х	As this policy is no doubt meant to interact directly with class/course communications, we feel it would be prudent to have language that specifically addresses this type of communication.	Added language in 4.1 to clarify that this policy is not intended to direct classroom communications between faculty and their classes.
Faculty Senate	4.2.1 & Policy Generally		X	To simplify the reading and understanding of policy, we suggest that outside documentation as in the case of "Student communication guidelines" in this policy or "Curriculum procedures" in Section 4.7 of Policy 605 be kept in a repository accessible through the Policy Manual on UVU's website and be directly linked to in the policy documents. This does not need to be done in place of our current	TOPS (The Online Policy System), which is currently in place, does not have the capability to link to such a repository. Nor does the Policy Office have the bandwidth or responsibility to maintain these documents and a repository.  The limitation of TOPS makes it difficult to keep links from other webpages updated. (It is the responsibility of other webpage owners to keep links

				system of keeping such documents housed within their university entities but is to be done as an additional step to this process.	updated.) The Policy Office plans to address this in the next iteration of TOPS.
Faculty Senate	4.2.4		X	Include the conditions under which and the accompanying process a sender may have privileges and access reinstated.	Added statement referring requests to the Student Communication Governance Council.
Faculty Senate	4.4.2		X	This subsection would make more sense if it were included in the procedures portion of the policy document. This could be done by splitting the idea in two:  • 5.1.4/5.2.4 Senders are responsible for obtaining students' consent to receive [email/text] communications • 5.3.5 Once student consent is received, senders are responsible for maintaining records of the opt-in and opt-out responses  As a vacuous policy, this idea is far too abstract to be understood.	This information is important to be covered in section 4.4.2, but we have added a reference in section 5.1.3 to section 4.4.2 to accommodate the recommendation.
Faculty Senate	4.4.3	X		It would read better if the second sentence did not begin with "They" with an unclear antecedent. We suggest it begin, "The sender shall" or "The same shall" though the latter is fun, the former is probably best. In either case, the word "also" can be dropped.	Updated wording as recommended.

Faculty Senate	4.6.1	X	As it is written, this subsection creates many undue burdens for the university, colleges, departments, and faculty alike. This could arise from a couple of issues:  • The policy itself is unclear in regard to terms like 'unsolicited' and 'mass communications'  • The policy itself is unclear in regard to terms like 'individual events/activities' and 'surveys/research requests'  • When writing this subsection, the idea seemed brilliant without understanding that these restrictions undermine the community and research aspects of faculty and student life at the university.  This should be removed.  On the other hand, we are all in favor on not receiving emails from Jason Osmond, VP of Marketing for Aubergine Kitchen, promoting the UVU Dining Service option of Aubergine Kitchen with the subject line "Mmmm cheese bread", or similar marketing emails from UVU adjacent entities.	Updated wording for 4.6.1.  We define mass communication in 3.4 and some of the unnecessary uses of "unsolicited" were removed as well for clarity. In regard to defining terms such as "individual events" and "surveys/research requests," additional wording was also added for clarity.  Addressing the final bullet point: We know from surveys and other input that students have been overwhelmed with university communication; so, we're working to enhance the quality of student life by sending only essential information. This policy addresses the concerns that students have expressed, and the communication needs they have.  Under this policy, email communications referenced from UVU-adjacent entities would not be allowed for students.
Faculty Senate	General	X	There should be specific language outlining how this policy applies to past students and alumni. Do they share in equal rights to current students under this policy? We believe they should.	The purpose of Policy 116 is to address communication with current students.  Communication with alumni or former students would be addressed in a separate policy.

PACE	4.4.1	X	This is likely referring to the guidelines, but it is confusing as written. Senders are responsible for obtaining approval. However, it doesn't say anywhere that approval is actually required.  Similarly, 5.1.4 states "unsolicited" email communication requires approval but is in the procedures section as a subpoint under "requests for email communications". ???	Wording updated in 4.5.1 and 5.1.4 for clarity
PACE	4.4.2	Х	Again, likely referring to the guidelines, but it is confusing as written. "When required" is not defined or easily understood.	Updated wording for clarity
PACE	4.6.1 (2)	X	There is a lot of confusion around who is allowed / not allowed to send out surveys. And when allowed, what approvals / channels are required before they can be sent out?  Consider working with Rasha / University Assessment to make 4.6.1 (2) more encompassing or provide additional clarity.	This wording has been updated in coordination with IEE's Data Collection team and IRB reviewers.  We clarified in the revision that communications for individual events should not be done via email. Added wording to specify channels that are more effective for these types of events.  Collaborated with the IRB review team and IEE to reword the statements on surveys and student research. Our intent is not to restrict surveys and research, but ensure approval is obtained through established processes.
PACE	4.6.1 (4)	Х	Recommend to define Canvassing, given it is not a frequently used term.	Updated wording for further clarity.
PACE	4.8.5	Х	Recommend to revise to add an example of the most common FERPA	Updated wording as recommended.

			violation: "including social security numbers, passwords, financial information, or academic information such as student grades."	
PACE	4.8.6	X	How will a department know if a student has revoked their right to be contacted?	This is denoted in the student record by a confidentiality marker and should be noted by BIRS in any student information request.
UVUSA	Overall	х	It's good to have this defined for campus so students can get important information and not fluff.	Thank you!
UVUSA	Overall	X	We have concerns that different areas on campus will not be able to get information to students as effectively and would like more expansion in information about opt-in options. The simplification is great, we just want students to be aware of the information out there in execution and believe this could be done with opt-in options.	We will add greater clarity to the guidelines.
UVUSA	3.0	х	Would like more specifics on how students can select what information they receive.	Due to the evolving nature of this type of process, policy is not the best location for this information. The current systems and processes don't allow for specific opt-in/opt-out by a universal process. Students are currently able to opt out through visible unsubscribe buttons in emails or by replying stop to a text message.
Academic Affairs Council			No comments.	