

# District Board Regular Meeting Tuesday, September 17, 2024

CITY BREWERY  
925 3<sup>RD</sup> ST S

*(Parking is available in the lot on the NW corner of 4<sup>th</sup> and Jackson Streets)*

LA CROSSE, WI 54601

## District Board Members:

Ryan Alderson      Lance Bagstad      Chet Doering      Michelle Greendeer-Rave  
Kevin Hennessey      Angie Lawrence      Ken Peterson      Megan Skarlupka      MaryKay Wolf

## At Table Agenda

### Items to be removed from the consent agenda

#### Approve Consent Agenda

##### 1) Policies

	Action	X
a) E0102 Protection of Student Information (2 <sup>nd</sup> read)	Page	2
b) G0100 Use of Data/Research (2 <sup>nd</sup> read)	Page	12
c) G0101 Research Projects and Survey (2 <sup>nd</sup> read)	Page	13
d) C0207 Political Activity (1 <sup>st</sup> read)	Page	15

# E0102 Protection of Student Information

## FERPA

The Family Educational Rights and Privacy Act (FERPA) protects the privacy of student education records. It is the policy of Western Technical College to adhere to the laws protecting the confidentiality of student information. **Education records are any record maintained by the College which directly relate to the student. This includes communication through college systems including text messages and emails.**

Under FERPA, students have the right to inspect and review their education records maintained by the College. The College must have written permission from the student in order to release any information from the student's educational record except directory information or for identified exceptions under the law. Western has designated the following information as directory information:

**Name**

**City**

**State**

**Dates of attendance**

**Class ~~e~~Credit load**

**~~Previous institution(s)~~ Colleges and schools attended**

**~~Major field~~ Program of study**

**Awards**

**Honors (includes President's and ~~Dean's List~~)**

**Degree(s) conferred (including dates)**

**Address (limited directory information only)**

**Phone (limited directory information only)**

**Email address (limited directory information only)**

The academic transcript with the College seal affixed, is considered the only official record of a student's performance. Transcripts will be released only ~~on~~ at [at](#)

the written request of the student. ~~A transcript may not be released if the student is financially indebted to the College.~~

## LIMITED DIRECTORY INFORMATION DESIGNATION:

Western does not disclose any directory information for marketing or solicitation purposes. Western designates address, email, and phone number information as limited directory information only. This information is only eligible for release to Western Technical College Foundation for Foundation-related activities and/or local, state or federal law enforcement agencies for safety and/or criminal investigative purposes; or as required for compliance with the Solomon Amendment.

## FTC RED FLAG RULES

In accordance with the Federal Trade Commission's (FTC) Red Flag rules, the College has developed an Identity Theft Prevention Program that helps protect consumer identity by responding to possible signals of identity theft known as "Red Flags". The Board delegates the authority to the President or his/her designee to implement and provide oversight review of the Identity Theft Prevention Program. The President or ~~his/her~~ **their** designee shall, from time to time, develop such procedures as are necessary to carry out this responsibility.

# E0102p Protection of Student Information Procedure

## FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

Access to a Western student record is governed by the Family Educational Rights and Privacy Act (FERPA). A student's educational record is confidential and generally shall not be released to anyone except the student, regardless of the student's age, without a student's written consent.

## REVIEWING EDUCATION RECORDS

Student education records are maintained in the Registrar's Office. All requests to review education records must be made to the Registrar's Office. Western reserves the right to have the request made in writing. The Registrar's Office must comply with the request within forty-five (45) days.

## RELEASE OF STUDENT INFORMATION

Prior written consent from the student must be obtained before information may be disclosed to any third party who does not meet the exemptions outlined in FERPA. Students can provide written consent by submitting a [Release of Student Information](#) form. The Release of Student Information is valid until it is revoked in writing.

## DIRECTORY INFORMATION

FERPA allows Western to release information designated as directory information without student consent. Students can request to withhold directory information by submitting a [Request to Withhold Directory Information form](#). If a student requests to withhold directory information, all future requests for information from non-institutional persons or organizations will be refused. The Request to Withhold Directory Information is valid until it is revoked in writing.

Western does not disclose any directory information for marketing or solicitation purposes. Western designates address, email, and phone number information as limited directory information only. This information is only eligible for release to

Western Technical College Foundation for Foundation-related activities and/or local, state or federal law enforcement agencies for safety and/or criminal investigative purposes; or as required for compliance with the [Solomon Amendment](#).

## SOLOMON AMENDMENT

Under the Solomon Amendment, information will be released for military recruitment purposes only. The military recruiter may request student information once each term for each of the 12 eligible units within the five branches of services:

- Army: Army, Army Reserve, Army National Guard
- Navy: Navy, Navy Reserve
- Marine Corps: Marine Corps, Marine Corps Reserve
- Air Force: Air Force, Air Force Reserve, Air Force National Guard
- Coast Guard: Coast Guard, Coast Guard Reserve

The request must be submitted in writing to the Registrar's Office and clearly identify the unit of service requesting the student recruitment information. The request should indicate whether the information is needed for the current or previous term.

## HEALTH AND PUBLIC SAFETY EXCEPTION

The College may disclose information from an education record, in the event of an emergency, to appropriate parties whose knowledge of the information is necessary to protect the health or safety of a student or other individual. This exception is limited to the period of the emergency and generally does not allow for a blanket release of PII from a student's education records. All requests for the release of information under a health and public safety exception must be made to the Director of Counseling and Case Management or the Campus Community Safety Director.

## ~~LEGAL REQUIREMENTS~~ RED FLAG RULES

Section 114 of the Federal Trade Commission's Fair and Accurate Credit Transactions Act of 2003 created the Red Flags Rule. The Fair Credit Reporting Act: Identity Theft Rules are identified in 16 CFR Part 681. These rules and

regulations require Western Technical College (Western) to **have an identity theft prevention program designed to** ~~develop and provide for the continued administration of a written Program to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing covered account and to provide administration of the procedure.~~ **The written program will be maintained by the Registrar's Office and will be made available upon request.** The College's procedure must:

- ~~Identify relevant Red Flags for covered accounts it offers or maintains and incorporate those Red Flags into the program~~
- ~~Detect Red Flags that have been incorporated into the procedure~~
- ~~Respond appropriately to any Red Flags that are detected to prevent and mitigate Identity Theft~~
- ~~Ensure the procedure is updated periodically to reflect changes in risks to students and to the safety and soundness of the creditor from Identity Theft~~

## DEFINITIONS

The following definitions are included as part of this procedure:

- ~~Identity theft — is fraud committed or attempted using the identifying information of another person without authority.~~
- ~~Covered account — is an account that a creditor offers or maintains, primarily for personal, family, or household purposes that involves multiple payments or transactions; and, any other account the College offers or maintains for which there is reasonably foreseeable risk to customers or to the safety and soundness of the College from identity theft. A student account and the corresponding student account number is considered a covered account.~~
- ~~Red flag — is a pattern, practice or specific activity that indicates the possible existence of identity theft.~~
- ~~Personal Identifying Information (PII) — is any name or number that may be used, alone or in conjunction with any other information, to identify a specific person. PII may include: name, address, telephone number, social security number, date of birth, driver license, identification number, alien~~

~~registration number, government passport, employer or taxpayer identification number, student identification number, computer's Internet Protocol address, or routing code.~~

## ~~IDENTITY THEFT PREVENTION PROGRAM~~

~~To ensure compliance with the Identity Theft Rules, Western employees will verify student identity when fulfilling information requests. These requests can be, but are not limited to, any of the following services:~~

### ~~ITEMS REQUIRING STUDENT IDENTIFICATION~~

- ~~1. Student Admissions Information including test results~~
- ~~2. Student Record Information including schedules, transcripts, grades, etc.~~
- ~~3. Student Account information including billing inquiries, balance owed, authorizations, etc.~~
- ~~4. Student Financial Aid Information~~
- ~~5. Parking Permits~~
- ~~6. Student ID Cards or ID Badge~~
- ~~7. Student Residence Hall Information~~
- ~~8. Any other information or document requiring student account access~~

### ~~FORMS OF ACCEPTABLE ID~~

~~"One" form of Government or Agency issued photo ID~~

- ~~1. Student ID~~
- ~~2. Valid Driver's License~~
- ~~3. Passport~~
- ~~4. DMV Authorized ID Card~~
- ~~5. High School issued ID card~~

~~OR~~

~~"One" of the following student specific pieces of information~~

- ~~1. Date of Birth~~

~~2. Student ID Number; AND~~

~~"Two" of the following presented verbally or in writing:~~

- ~~1. Classes Registered — past or current~~
- ~~2. Personal Email~~
- ~~3. Final Grades — past or current~~
- ~~4. Address on File~~
- ~~5. Last 4 Digits of Phone Number on File~~

~~-~~

## ~~RED FLAGS FOR COVERED ACCOUNTS~~

~~Western staff members should use the following risk factors to identify relevant red flags for covered accounts:~~

### ~~Suspicious Documents~~

- ~~• Identification document or card that appears to be forged, altered or inauthentic~~
- ~~• The photograph or physical description on the identification is not consistent with the appearance of the student presenting the identification~~
- ~~• A request for service that appears to have been altered or forged~~
- ~~• A request made from a non-college issued e-mail account~~
- ~~• A request to mail something to an address not listed on the file~~

### ~~Suspicious Identifying Information~~

- ~~• Identifying information presented that is inconsistent with other information the student provides (example: inconsistent birth dates)~~
- ~~• Identifying information presented that is inconsistent with other sources of information (example: address mismatch on personal documents)~~
- ~~• Identifying information presented that is the same information shown on other applications that were found to be fraudulent~~



- Identifying information presented that is consistent with fraudulent activity (example: invalid phone number or fictitious billing address)
- Social security number presented that is the same as one given by another person
- A person fails to provide complete personal identifying information
- A person's identifying information is not consistent with the information that is on file for the student

#### Suspicious Account Activity

- Account used in a way that is not consistent with prior use
- Notice to the College that a student is not receiving mail sent by the College
- Notice to the College that an account has unauthorized activity
- Breach in the College's computer security system
- Unauthorized access to or use of student account information

Alerts from Others Notice to the College from a student, Identity Theft victim, law enforcement or other person that the College has opened or is maintaining a fraudulent account for a person engaged in Identity Theft.

## ~~PROCEDURE FOR REPORTING SUSPECTED OR REPORTED RED FLAG ISSUES~~

When a case of identity theft is reported or suspected, Western employees shall do the following:

1. Employee will inform supervisor and immediately submit an incident report through the online report system ([https://cm.maxient.com/reportingform.php?WesternTC&layout\\_id=14](https://cm.maxient.com/reportingform.php?WesternTC&layout_id=14))
2. Maxient report will automatically forward to the Cyber Breach Response Team
3. The Cyber Breach Response Team will determine necessary action

## ~~BEST PRACTICES FOR KEEPING STUDENT INFORMATION CONFIDENTIAL~~

~~To reduce the risk of identity theft, Western staff members should practice the following:~~

- ~~1. Never ask a student to instant message or e-mail sensitive personal information or credit card information.~~
- ~~2. Never ask a student to verbally declare their personal information in the presence of others.~~
- ~~3. Don't leave documents containing sensitive information lying around.~~
- ~~4. Sensitive personal documents should be placed in secured shred boxes~~
- ~~5. Drop off should be used to email sensitive personal documents or information~~
- ~~6. When leaving your workstation, lock or sign-off your computer.~~
- ~~7. Be sure documents at the printer are secure. If a document is printed and lying on the printer, contact the owner or deliver the document immediately.~~

## PROGRAM ADMINISTRATION

The ~~Dean of Students~~ Registrar will serve as the Program Administrator and is responsible for developing, implementing, and updating this program. The Program Administrator will be responsible for ensuring appropriate training of College staff on the program, for reviewing any staff reports regarding the detection of Red Flags and the steps for preventing and mitigating ~~i~~identity ~~t~~Theft, determining which steps of prevention and mitigation should be taken in particular circumstances and considering periodic changes to the program.

## SERVICE PROVIDER ARRANGEMENTS

In the event the College engages a service provider to perform an activity in connection with one or more covered accounts, the College will take the following steps to ensure the service provider performs its activity in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of ~~i~~identity ~~t~~Theft

- Require, by contract, that service providers have such policies and procedures in place; and
- Require, by contract, that service providers review the College's program and report any Red Flags to the Program Administrator

#### Program Updates

The Program Administrator will periodically review and update this program to reflect changes in risks to students and the soundness of the College from **i**dentit**y t**heft. In doing so, the Program Administrator will consider the College's experiences with **i**dentit**y t**heft situations, changes in **i**dentit**y t**heft methods, changes in **i**dentit**y t**heft detection and prevention methods, and changes in the College's business arrangements with other entities. After considering these factors, the Program Administrator will determine whether changes to the program, including the list of Red Flags, are warranted. If warranted, the Program Administrator will update the program.

Approved June 16, 2009

Updated January 8, 2020

Reference Policy: [E0102 Protection of Student Information](#)

Reference Procedure: [E0102p\(2\) Telecommuting Procedure](#)

## Current Policies

### G0100 ~~Data Use~~Use of Data/Research and Information Technology

Western is committed to data-informed decision making as it ~~pertains~~relates to ~~meeting the College's~~our mission and ~~reaching our~~vision through the achievement of ~~by~~in support of achieving our strategic goals. ~~Western's Key Results are~~integral into measuring progress towards meeting ~~achieving our~~the organization's strategic goals ~~are our organizational~~Key Results. The ~~Key R~~esults are standardized data elements ~~and definitions~~ that define the overall success of the organization's mission to serve students, ~~and are used to support the planning and~~managing of College operations, and measuring organizational performance. This and other institutional data ~~and~~ are supported by ~~institutional~~research ~~Research~~ and ~~information~~Information ~~technology~~Technology. The ~~Key r~~esults are used for planning and managing College operations and for measuring organizational performance.

#### Revised

*Revised November 17, 2015*

*Revised September 15, 2015*

*Reviewed May 19, 2015*

*Adopted July 13, 2009*

### G0100p Procedure for Data Use Research and Information Technology

All requests for data, research, information, and survey administration at Western will be directed through the ~~institutional~~Institutional Research ~~D~~epartment. ~~The director of institutional research will determine the need for consultation with the Institutional Research Board (IRB) based on the request.~~ Requests will be ~~shared~~shared with the Priority Advisory Board for approval and prioritization and the ~~Information Technology (IT) department~~Department will be consulted when necessary ~~when an approved standard report or data set is not available.~~ This ~~will help insure~~ensures the collection and use of consistent, reliable, and valid data.

All requests for operational technology-related processes and reports will be directed through the ~~Information Technology~~Media Networking Services (INMS) ~~(IT) D~~epartment. ~~The director of INMS will chair the Priority Advisory Board, and process and project requests will be shared with the Priority Advisory Board for approval and prioritization as needed.~~ This ~~will help insure~~ensures that operational processes and procedures requiring technology support ~~will be~~are reviewed before resources are committed for implementation.

#### Revised

*Approved July 13, 2009*

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## G0101 Research Projects and Surveys

Western Technical College supports the collection and analysis of data to ~~support~~ ~~inform~~ decision making and ~~to~~ improve the efficiency and effectiveness of College programs, services, and operations. Research and evaluation studies may be conducted by College staff and/or by outside consultants or agencies under the direction of the ~~Institutional Research Office~~ ~~Department~~. ~~The director of institutional Research will determine the need for consultation with the Institutional Research Review Board (IRB) based on the request, and upon approval by the Research and Technology Team (RTT).~~ ~~Such All studies must be mindful of the rights of individuals and be conducted according to the guidelines-standards established by the U. S. Department of Health and Human Services (DHHS) and respect the rights of individuals.~~

*Revised*

Adopted July 19, 2012

## G0101p Research Projects and Surveys Procedure

**Definition:** -Research includes any ~~systematic-organized~~ activity that obtains generalizable knowledge or other primary data for ~~any a~~ purpose other than the measurement of student performance for the student's benefit. Examples may include:

- Survey or data collection to provide materials for presenting at professional conferences or meetings, or for publication
- Gathering of data to be used in a class assignment or thesis
- Activities requested by a third party in exchange for some type of compensation

All surveys and research projects conducted at Western Technical College shall follow the following procedure:

- ~~1. Preparing~~ Preparation of a draft of the research design and research instruments to be used in the research including:
  - ~~a.~~ Beginning and ending dates
  - ~~b.~~ Intent of the research or purpose of the study
  - ~~c.~~ Name of researchers
  - ~~d.~~ Description of the data collection process/methodology
  - ~~e.~~ Instruments to be used to conduct the research including letters and description of activities
  - ~~f.~~ Statement on how privacy will be maintained
  - ~~g.~~ Statement on the level of risk involved for the participants, and copy of informed consent document if the risk is more than minimal
  - ~~h.~~ Institutional Review Board (IRB) ~~RB~~ approval from the initiating organization, as appropriate
- ~~2.~~ Identification of a faculty research advisor if the researcher is a student
- ~~3. Attainment of~~ Obtaining approval by the College Department ~~of or~~ Division where the research will be conducted
- ~~4.~~ Review by the College Institutional Research ~~Office~~ Department

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<https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/index.html>

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- ~~Obtaining Attainment of~~ approval by the outside institution IRB, if appropriate
- ~~Obtaining approval by the RTT, if appropriate~~
- 5.
- 6. ~~Services provided facilitated by the College~~ The Institutional Research Office ~~Department~~ facilitates the following services include: ~~INDENT ITEMS BELOW(?)~~
  - ~~a. Review of~~ research procedures and instruments to ensure that regulations are met, and risk is minimized
  - ~~b. Assist in refin~~ Refinement of ~~ing~~ project ideas, tools, and survey instruments
  - ~~c. Provide assurances~~ Assurance of cooperation required by external IRBs (most thesis projects require approval from the IRB of the degree granting institution)

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The review of proposed research requires the researcher to provide evidence of:

- Department or ~~d~~ Division approval where the staff or students will be the focus of the proposed research
- Identification of commitments of time and other resources
- The extent that the research activity might interrupt the teaching/learning/working environment of the College
- Assurance that individual student or staff information cannot be identified and is destroyed upon completion of the research

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Failure to obtain approval ~~by through~~ the College Research Office and Institutional Research Department ~~or the Research and Technology Team acting as the Institutional Review Board~~ prior to undertaking any research activity is a violation of ~~college this~~ college policy. -It also releases Western Technical ~~college College~~ from any ~~indirect liability otherwise incurred by virtue of the fact that it "should know" that the activity has taken place~~, thereby leaving the researcher solely responsible for any liability incurred.

Revised

Approved July 19, 2012

# C0207 Political Activity

The College imposes ~~reasonably~~ necessary limitations on political activity to **remain nonpartisan** ~~protect its independence in academic and business matters, and to comply~~ ensure compliance with **state and federal** the laws **in the College's operations** ~~under which it operates.~~

Employees ~~and students should feel free~~ **have the right** to engage in political activities **individually, but** ~~while being mindful that activities must be conducted on an individual basis and~~ not as a representative of Western, **while at work at Western, on Western property, or using Western technology or equipment.**

Employees ~~and students~~ may not represent their political views, or the views of any candidate, as Western's viewpoint, nor may they utilize college resources (including, but not limited to, employment status and title) while expressing their private opinions; this includes posting to social media ~~on~~ **using** college technology.

~~The policy does not prohibit any legislator or candidate for public office from attending any college sponsored public function as a guest of the College or from being on the premises as a private individual to conduct business with the College.~~

Revised April 16, 2019

Revised January 7, 2015 (grammatical changes)

Adopted January 17, 2012

Reference Policy: [B0408 Computer and Telecommunications Usage](#)

Reference Policy: [C0206 Code of Ethics for Employees](#)

Reference Policy: [F0304 Petitions](#)