

STRATEGIC MARKETING & COMMUNICATIONS POLICY

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INTERNET AND SOCIAL MEDIA PRIVACY STATEMENT

Westchester Community College respects the privacy of all visitors to our web site and does not provide any of our personal information to third parties without your permission, unless compelled by law or court order to do so, and does not sell any personal information to third parties for purposes of marketing, advertising, or promotion. However, the college reserves the right to share data with our marketing partners for marketing reporting purposes and for remarketing and retargeting college messages to individuals who visit our website or contact the college.

The following Westchester Community College Privacy Policy explains what information is being collected and how it will be used.

Endorsements and Accuracy of Content

Westchester Community College provides access to distributed and local networked resources as a service to the campus community and the community at large. The availability of networked information via Westchester Community College's information services does not constitute endorsement of the content or accuracy of that information by Westchester Community College. Sections linked to this site are maintained by independent groups and individuals. The views expressed in these home pages are those of the page authors; comments regarding those pages should be directed to them.

Equal Opportunity Institution

Westchester Community College is an equal opportunity institution and adheres to the policy that no person on the basis of race, color, sex, religion, national origin, age, disability, sexual orientation, or genetic information is excluded from or is subject to discrimination in any program or activity.

Commitment to Privacy

At Westchester Community College, we are committed to protecting your privacy and making it easier for individuals and businesses to interact with Westchester Community College. We recognize that it is critical for individuals and businesses to be confident that their privacy is protected when they visit www.sunywcc.edu. You can travel through most of www.sunywcc.edu without giving us any information about yourself. Sometimes we do need information to provide services that you request, and this commitment of privacy explains our online information practices.

Voluntary Communication

Westchester Community College collects only personal information that is provided voluntarily when someone sends an e-mail or completes Westchester Community College online forms.

This policy is consistent with the provisions of the following:

- [Internet Security and Privacy Act](#)
- [Freedom of Information Law](#)
- [Personal Privacy Protection Law](#)

Collected Information

When a party visits www.sunywcc.edu, Westchester Community College automatically collects and stores the following information about the visit:

- The Internet Protocol address of the computer that accessed the web site
- The type of browser, its version, and the operating system on which that browser is running
- The web page from which the user accessed the current web page
- The date and time of a request
- The pages visited and the amount of time spent at each page
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None of the above-mentioned information is deemed to constitute personal information by the Internet Privacy and Security Act. The information that is collected automatically is used to improve www.sunywcc.edu's content and to help Westchester Community College understand how users are interacting with its website. This information is collected for statistical analysis and to determine what information is of most and least interest to users. The information is not collected for commercial marketing purposes and Westchester Community College is not authorized to sell or otherwise disclose the information collected from www.sunywcc.edu for commercial marketing purposes.

Information Collected from E-mail or Online Transaction

When email is received by Westchester Community College through www.sunywcc.edu, the College collects the e-mail address, the contents of the message, and associated data, including text characters, audio, video, and graphic information formats. The College responds to the e-mail address and the content of the message. The e-mail address is not collected for commercial purposes and Westchester Community College is not authorized to sell or otherwise disclose personal or corporate e-mail addresses for commercial purposes.

The information collected by Westchester Community College through www.sunywcc.edu, including volunteered personal information, is used by Westchester Community College for the purposes that may be reasonably ascertained from the nature and terms of the transaction in which the information was submitted.

Aggregate Information

The College may anonymize personal information, including website usage information, either by combining it with information about other individuals or by removing characteristics that may reveal individual or corporate identity. The College may use and share with third parties the anonymized information. The Personal Privacy Protection Law does not restrict the College's right to aggregate or de-personalize personal information and share such anonymized information with third parties.

Information regarding minors (children under the age of 13)

Westchester Community College does not knowingly collect personal information from children under the age of 13 or create profiles of children under the age of 13. Users are cautioned, however, that the collection of personal information submitted in an e-mail will be treated as though it was submitted by an adult unless otherwise stated, and may, unless exempted from access by federal or State law, be subject to public access.

Disclosure of Information Collected Through This Website

The collection of information through www.sunywcc.edu and the disclosure of that information are subject to the provisions of the Internet Security and Privacy Act. Westchester Community

College will only collect personal information through www.sunywcc.edu or email (See Information Collected from E-mail or Online Transaction above) or disclose personal information collected through www.sunywcc.edu or email if the user has consented to the collection or disclosure of such personal information. The voluntary disclosure of personal information to Westchester Community College by the user, constitutes consent to the collection and disclosure of the information by Westchester Community College for the purposes for which the user disclosed the information to Westchester Community College.

Westchester Community College may collect personal information from www.sunywcc.edu if the collected information is:

1. to be used to validate the identity of the user; or
2. to be used solely for anonymized statistical purposes.

Subject to the provisions of the [Freedom of Information Law](#) and the [Personal Privacy Protection Law](#), Westchester Community College may unilaterally disclose personal information collected from www.sunywcc.edu if the disclosure is:

1. necessary to perform the statutory duties of Westchester Community College, or necessary for Westchester Community College to operate a program authorized by law, or authorized by state or federal statute or regulation;
2. made pursuant to a court order or law;

Unauthorized Access (hacking)

Westchester Community College may disclose personal information to federal or state law enforcement authorities to enforce its rights against unauthorized access or attempted unauthorized access to Westchester Community College's information technology assets.

Access to and Correction of Personal Information Collected through www.sunywcc.edu

Any user may submit a request to Westchester Community College's privacy compliance officer to determine whether personal information pertaining to that user has been collected through www.sunywcc.edu. Any such request shall be made in writing and must be accompanied by reasonable proof of identity of the user. Reasonable proof of identity may include verification of a signature, inclusion of an identifier generally known only to the user, or similar appropriate identification. The address of the privacy compliance officer is:

Director, Strategic Marketing and Communications
Westchester Community College
75 Grasslands Road
Valhalla, New York 10595

The privacy compliance officer shall, within five (5) business days of the receipt of a proper request, provide access to the personal information; deny access in writing, explaining the reasons therefore; or acknowledge the receipt of the request in writing, stating the approximate date by which the request will be granted or denied, which date shall not be more than thirty (30) days from the date of the acknowledgment.

In the event that Westchester Community College has collected personal information pertaining to a user through www.sunywcc.edu and that information is to be provided to the user pursuant to the user's request, the privacy compliance officer shall inform the user of his or her right to

request that the personal information be amended or corrected under the procedures set forth in [section 95 of the Public Officers Law](#).

Retention of Information Collected through www.sunywcc.edu

The information collected through www.sunywcc.edu is retained by Westchester Community College in accordance with the records retention and disposition requirements of the [New York State Arts and Cultural Affairs Law](#). In general, the Internet services logs of Westchester Community College, comprising electronic files or automated logs created to monitor access and use of Agency services provided through www.sunywcc.edu, are retained indefinitely. Information concerning these records retention and disposition schedules may be obtained through the Internet privacy policy contact listed in this policy.

Confidentiality and Integrity of Personal Information Collected

Westchester Community College is strongly committed to protecting personal information collected through www.sunywcc.edu against unauthorized access, use or disclosure.

Consequently, Westchester Community College limits employee access to personal information collected through www.sunywcc.edu to only those employees who need access to the information in the performance of their official duties. Employees who have access to this information follow appropriate procedures in connection with any disclosures of personal information.

In addition, Westchester Community College has implemented procedures to safeguard the integrity of its information technology assets, including, but not limited to, authentication, authorization, monitoring, auditing, and encryption. These security procedures have been integrated into the design, implementation, and day-to-day operations of www.sunywcc.edu as part of the College's continuing commitment to the security of electronic content as well as electronic transmission of information.

For web site security purposes and to maintain the availability of www.sunywcc.edu for all users, Westchester Community College employs software to monitor traffic to identify unauthorized attempts to upload or change information or otherwise damage www.sunywcc.edu.

Cookies

www.sunywcc.edu uses technologies, including cookies. [Cookies](#) are text files placed on your computer by a web server, enabling the site to recognize you and keep track of your preferences. You have the ability to accept or decline cookies by changing your browser settings. If you choose to decline cookies, some features on this website may not work properly.

Use of E-Mail

In spite of the good intentions of the college to respect the privacy of individuals, it should be understood that it is impossible to assure the privacy of e-mail. Not only may email be sent to someone other than the intended recipient (either through mis-addressing or forwarding), but email sent as plain text may also be intercepted as it travels over the network

The use of College resources, including computing and networking equipment and services, purchased with College funds, is intended for college business. While it is not the intention of the College to actively monitor communications or files stored or transmitted on College systems or devices, individuals must understand that under certain circumstances they may not have a right to privacy to such information. Such circumstances include, but are not limited to:

- compliance with legal requirements or process;
- investigation of a suspected violation of law; and
- regulation or College policy – to maintain the integrity of the College’s computing systems.

Freedom of Information Requests

Under the “[Freedom of Information Act](#) (FOIA)”, except as otherwise provided by federal law or state statute, all records maintained or kept on file are considered public records and are subject to inspection by members of the public. Email and any information collected in the course of visiting a web site are considered public records and may be subject to Freedom of Information disclosure. In some cases email messages about students may fall under the FERPA definition of ‘education records’ and therefore be subject to the provisions of FERPA regarding the release of the information and the student’s right to inspect and review the information.

Disclaimer

The Westchester Community College Privacy Policy does not apply to websites linked through www.sunywcc.edu. The user is subject to the privacy policy of the linked website.

Neither Westchester Community College, nor any agency, officer, or employee of Westchester Community College warrants the accuracy, reliability or timeliness of any information published on www.sunywcc.edu, nor endorses any content, viewpoints, products, or services linked to www.sunywcc.edu, and shall not be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of such information. Portions of such information may be incorrect or not current. Any person or entity that relies on any information obtained from www.sunywcc.edu does so at their own risk.

Westchester Community College reserves the right to revise and update its privacy policy at any time by posting such revised privacy policy on the Westchester Community College home page.

Internal, college-wide emails are to be concerned with college business. The College does not condone the dissemination of political or personal messages through college-wide emails, unless specifically approved by the Office of Strategic Marketing and Communications. In certain cases, if the messages are deemed to be connected to specific college events, clubs, or college-sponsored enterprises, such messages will be approved. All such messages must be approved in advance by the Office of Strategic Marketing and Communications.

Wireless Statement

The College does not guarantee the security of personal information transmitted through its wireless network, despite the firewall protection.

Definitions

The following definitions apply to, and appear in italics, in this policy:

Personal information: For purposes of this policy, “personal information” means any information concerning a natural person which, because of name, number, symbol, mark, or other identifier, can be used to identify that natural person.

User: shall have the meaning set forth in subdivision 8 of section 202 of the State Technology Law.

Blog policy

Westchester Community College blogs have been created for use by members of the greater community, including but not restricted to prospective and current students blogging from any location, Westchester County residents, college alumni, faculty, staff, and administrators. The purpose of the blogs is to facilitate communication to and from the college and its greater “community,” which includes all of the above. Commentary and opinion are most welcome.

The Westchester Community College Office of Strategic Marketing and Communications will only post comments from bloggers 13 years or older that relate to topics concerning the college and its community. The Office of Strategic Marketing and Communications will remove the following types of material or communications from the Westchester Community College blog:

- Potentially libelous comments.
- Vulgar, racist, sexist comments.
- Personal attacks.
- Plagiarized material.
- Private information published without consent.
- Material related to gambling.
- Items that could damage other computers.
- Commercials, soliciting for personal gain, or spam.
- Profanity or objectionable images.

Repeat offenders will be banned.

The College reserves the right not to post comments or images. The views and opinions expressed by bloggers are strictly those of the authors, not of the College. Bloggers agree not to impersonate other people and are held responsible for their comments.

Contact Information

For questions regarding this Internet privacy policy, please contact the privacy officer via e-mail at info@sunywcc.edu or by regular mail at:

Director, Strategic Marketing and Communications
Westchester Community College
75 Grasslands Road
Valhalla, New York 10595

COLLEGE CLOSINGS AND DELAYS ANNOUNCEMENTS

Policy

Weather Watch

Information on closings and delayed openings is posted on www.sunywcc.edu and can also be obtained by a phone call to 914-606-6900. Additionally, the College posts delay/closing updates on Facebook and Twitter.

The College provides information on weather closings and delays to News Channel 12, WCBS (880 AM), and WHUD (100.7 FM). Since these media outlets broadcast and update weather

closings and delays at their discretion, the college website remains the most reliable source of information on weather closings and delays.

Unless a delay or closure is announced, all classes will meet as scheduled. If the weather gets worse as the day progresses the decision to cancel evening classes will be made at approximately 3:00 pm.

Text Messages Related to Closings and Delays

The College will send text messages on closings and delays to mobile phone numbers posted on MyWCC. Please click here for a PDF document on directions for updating phone information or opting out of receiving text messages.

On a case-by-case basis, the college will host two “staging areas” for students and staff who are waiting out a storm or awaiting rides. In addition to the Student Center Lounge and/or Cafeteria, which normally serve as a holding areas for students in these instances, the College will occasionally also open up the Gateway Center atrium.

Delayed Opening

A delayed opening may affect a class meeting, depending on when the class is scheduled. For instance, if the college has a delayed opening at 11:00 a.m., a class which normally runs from 8:00 to 10:00 a.m. will not meet. However, a class which normally runs from 10:00 until 11:30 a.m. will meet for a half hour, from 11:00 to 11:30 a.m.

DIGITAL SIGN POLICY

Definition

Digital signs are signs which run through the Appspace system on the main campus and at extension centers.

Purpose

Digital signs allow various campus organizations and partners of the college to publicize events and information of interest, including academic programs, meetings, student activities, emergency messages, and student services. They are not to be used for advertising non-college events or news, unless specifically approved by the Office of Strategic Marketing and Communications. The priority of digital signs is to promote classes, semester dates, and academic program offerings.

The college does not generally use digital signs for directions unless there is secondary parking information included in a sign. Digital signs are not to be used as directional or parking resources for secondary (small) events.

The Office of Strategic Marketing and Communication designs the bulk of the digital signs but allows certain college entities such as Smart Arts to submit their own designs for approval. Extension locations are generally allowed to design their own “complementary” signage.

POLICY

The Office of Strategic Marketing and Communication reviews all digital signs and makes the ultimate decision on what to display. Permissions take into account various technical, legal, and aesthetic factors, including but not limited to adherence to brand standards, copyright laws,

effective and concise messaging, and compatibility with the Appspace system. The Office of Strategic Marketing and Communication decides signage display priority. The college is not responsible for the accuracy of the information displayed in Appspace. The Office of Strategic Marketing and Communication does not guarantee timely display of digital signs.

PROCEDURE

The Office of Strategic Marketing and Communication requires a two-week notice prior to proposed display dates for new signs. Secondary digital signs will be “bumped” if there is insufficient space in Appspace.

WEBSITE ACCESSIBILITY

Website Accessibility Policy

Westchester Community College is committed to ensuring accessibility of its website to people with disabilities. The college seeks to make sure the website conforms to the Americans with Disabilities Act, Sections 504 of the Rehabilitation Act, and New York State Technology Policy 99-3. New and updated web content on <http://www.sunywcc.edu> follows the W3C WAI's Web Content Accessibility Guidelines 2.0, Level AA. Any issues should be reported to the Web Manager patrick.dannenhoffer@sunywcc.edu

SOCIAL MEDIA POLICY

Purpose of Social Media Sites

The purpose of the social media sites is to facilitate communication to and from the college and its greater “community” and to further promote the College brand and mission via currently popular technology platforms. Members of the greater community include but is not restricted to prospective and current students, Westchester County residents, college alumni, faculty, staff, and administrators.

Sharing news, events or promoting faculty and student work through social media tools is a powerful, low-cost way to engage the community and build our Westchester Community College brand. Employees are encouraged to repost and share information with their family and friends that is available to the public. The best way to share college news is to link to the original source either on social media or on the college website.

Policy

Social media play a vital role in furthering the college’s mission by providing channels of interaction and engagement between the college and students, parents, faculty, employees, alumni, media, the surrounding community, potential students and donors. The college seeks to speak with one voice on official matters and to protect and accurately communicate the college’s mission and reputation. The Office of Strategic Marketing and Communications shall have the final say on all college social media accounts.

The Office of Strategic Marketing and Communications encourages comments from all users 13 years or older relating to topics concerning the college and its community. The following will be

removed by Westchester Community College's social networking site administrators, and repeat offenders will be banned for:

- Potentially libelous comments.
- Vulgar, racist, sexist, or comments pertaining to violence.
- Personal attacks.
- Plagiarized material.
- Private information published without consent.
- Profanity.
- Material related to gambling.
- Items that could damage other computers.
- Commercials, soliciting for personal gain, or spam.

The college reserves the right to delete comments. The views and opinions expressed by fans/friends are strictly those of the authors. Since the contents of postings may create lasting consequences, posters should be respectful and professional. Posters are responsible for their comments and must not represent themselves as someone else.

Students are obligated to conduct themselves in a manner compatible with the institution's academic standards, general policies, and the Student Code of Conduct. This includes comments made on social media. Behavior which adversely affects a student's responsible membership in the academic community shall result in appropriate disciplinary action. Social media are not the appropriate forum to discuss opinions on individual students, faculty or staff. Posters should not share personal information they do not want to be made public. Students who wish to communicate with the College on a private matter should email the College at info@sunywcc.edu.

HELPFUL GUIDELINES

Maintain Confidentiality

Social media posters must not post confidential or proprietary information about Westchester Community College, its students, its alumni, and/or your fellow employees. Posters must use good, ethical judgment and follow college policies and federal requirements, such as the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Family Educational Rights and Privacy Act (FERPA). Review HIPAA requirements and FERPA information.

Maintain Privacy

Social media posters must not discuss a situation involving named or pictured individuals on a social media site without their permission. Additional information on the appropriate handling of student, employee, and patient information can be found on the college website covering FERPA and HIPAA.

Respect College Time and Property

It is appropriate to post at work if comments are directly related to accomplishing work goals, such as seeking sources for information or working with others to resolve a problem. Employees should participate in personal social media conversations on their own time.

Do No Harm

Social media networking, on- or off-campus, should do no harm to Westchester Community College, other individuals, or oneself.

Understand Your Personal Responsibility

Social media posters are personally responsible for the content they publish on blogs, wikis, or any other form of user-generated content. Posters should protect their privacy and that of others, mindful that what they publish will be public for a long time and may be permanently recorded somewhere.

Be Aware of Liability

Social media posters are responsible for what they post on their own site and on the sites of others. Individual bloggers have been held liable for commentary deemed to be copyright infringement, defamatory, proprietary, libelous, or obscene (as defined by the courts). Posters are also responsible for complying with the existing rules of social media web sites. For example, Facebook has regulations regarding the use of promotions (prizes and giveaways) on its web site.

Maintain Transparency

Transparency involves thoughtfulness about one's posts and honesty about one's identity. Westchester Community College employees making personal posts on social media must make clear that they are sharing their views as individuals, not as representatives of the College.

Correct Mistakes

Posters must publicly admit and correct mistakes quickly.

Follow Best Practices in Security

To maintain account security, posters must ensure that they have total access to the logins, passwords, and procedures for their personal accounts before allowing someone else to create and manage those accounts on their behalf.

Respect Others

The goal of persuasion is best achieved when a poster is constructive and respectful while discussing a bad experience or disagreeing with a concept or person.

Be a Valued Member

Courtesy requires that posters contribute valuable insights to topics under discussion and not hijack and redirect the discussion by posting self- or organization-promoting information. Self-promoting behavior is viewed negatively and can lead to one's being banned from Web sites or groups.

Think Before You Post

There's no such thing as a "private" social media site. Search engines can turn up posts and pictures years after the publication date. Comments can be forwarded or copied. Archival systems save information even if you delete a post. It is best to post when one is calm and clearheaded rather than when one is angry or passionate about a subject. One should only post pictures that one would be comfortable sharing with the general public (current and future peers, employers, etc.).

MASS COMMUNICATIONS POLICY

These guidelines are designed to achieve two goals in the use of mass communications: to reduce reliance on paper-based communications where appropriate, and to streamline the overall influx of mass communications that impact each member of the college community.

Defining mass communications

A mass communication is a message sent to at least 1,000 members of the college community using;

1. The college's "mailman" email system
2. The RAVE emergency alert notification system
3. The Oracle CRM system.

Defining the Target

- All-employee Communication: A communication sent to staff, faculty, and administrators.
- All-staff Communication: A communication sent to staff only.
- All-faculty Communication: A communication sent to faculty only.
- All-student Communication: A communication sent to students only
- College-wide Communication: A communication sent to all staff, faculty, administrators, and students.

The information in the mass communication should be of significant value and noteworthy to the college community.

Mass communications are intended to support college community members by providing them with the information needed to perform their jobs and to engage them in the work of the college OR to provide students with information that is of necessity or interest OR to initiate a reaction to a large-scale event (for example, open house) or action item (for example, registration). As such, mass communication messages must be related to college business, of general interest and importance to a sizable number of staff, faculty, and/or students, and of significance to the college community as a whole.

Policy

Mass communications may originate only from the following offices and auxiliary units or their designees.

1. the Board of Trustees
2. the Office of the President
3. the Offices of the Vice Presidents and Their Subsidiary Offices as Follows:
 - a. Provost and Vice President for Academic Affairs
 - i. Faculty Senate
 - b. Vice President for Workforce Development and Community Education and Student Access, Involvement, and Success
 - i. Enrollment Management
 - ii. Student Involvement
 - c. Vice President for Administrative Services
 - i. Campus Safety & Security
 - ii. Facilities
 - iii. Human Resources
 - iv. Faculty Student Association
 - v. Staff Council
 - d. Vice President for External Affairs
 - i. Westchester Community College Foundation
 - e. Vice President for Information Technology

Special Policy Authorizations

1. The Board of Trustees and Office of the President may send mass communications at any time.
2. The Office of Human Resources may send group or all-employee communications at any time.
3. The Faculty Senate may send mass communications to all faculty (full time and/or adjunct) at any time.
4. The Staff Council may send mass communications to all staff at any time.
5. WCCFT and CSEA may send mass communications to its members at any time.
6. The Offices of the Vice Presidents and auxiliary units may send group communications at any time.
7. The Office of Strategic Marketing & Communications may send all-employee and college-wide communications, student and employee communications and text messages via RAVE, and assist in preparing communications to be sent via the CRM.

Procedure

Sending a mass communication

Requests for distribution of a mass communication should be directed to the Office of Strategic Marketing and Communications through the completion of a job request form available here.

A moderator from the Office of Strategic Marketing and Communications consults with the communication requestor to determine whether mass communication is the appropriate communication channel for the message and may suggest one of the following alternatives:

- An event post on the Westchester Community College Events Calendar on the college website: www.sunywcc.edu/events
- A news post on the official college website: www.sunywcc.edu/news
- A hand-off to the Viking News for print consideration
- Inclusion in the Viking Weekly newsletter
- A post or series of posts on official college social media outlets
- A combination of any of the above

The moderator will also ensure that multiple messages are not sent on the same day unless necessary, so as not to create overload on system infrastructure or on communication recipients.

- The deadline for receiving content for these communications is Thursday for the following Monday's communication and Monday for Thursday's communication. The Office of Strategic Marketing and Communications may limit the frequency of distribution of the same or similar content.
- Mass communications should be limited to 250 words and may be edited for content or style.
- Mass communications should not include attachments but may link to online content (both on the college's official site and on external websites) for further information.
- Mass communications requests pertaining to an employee's retirement or other event that may change existing workflow should be submitted by the supervisor of said employee. Such notices directly from said employee will not be accepted.

Lead-time requirements

The Office of Strategic Marketing and Communications requires a lead-time of five business days to evaluate, approve, and send out campus-wide communications to the moderated distribution email lists.

Text Messaging Policy

Purpose -This policy outlines the procedures and guidelines for the use of text messaging to communicate with students at SUNY Westchester Community College, in compliance with the Telephone Consumer Protection Act (TCPA).

Scope - This policy applies to all departments, staff, and third-party vendors that use text messaging as a form of communication with students.

Consent - By providing a mobile phone number to SUNY WCC, students give their express consent to receive text messages from the college. Consent may be revoked at any time by following the opt-out instructions in each message.

Message Types - Messages may include, but are not limited to, enrollment information, class updates, emergency alerts, and campus events.

Frequency - The number of messages will vary based on the department and the nature of the communication.

Opt-Out - Students can opt-out of receiving text messages by replying "STOP" to any message or by contacting the college directly.

Compliance - All text messaging will adhere to federal and state laws and regulations, including the TCPA.

Responsibility - The management and monitoring of text messaging will be overseen by members of the college's CRM Team.

Review - This policy will be reviewed annually to ensure ongoing compliance with legal requirements.