

# HOWARD UNIVERSITY POLICY

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**Policy Title:** 700-007 ONLINE PRIVACY NOTICE POLICY  
**Responsible Officer:** Chief Communications Officer  
**Responsible Offices:** Office of University Communications (OUC)  
Office of Enterprise Technology Services (ETS)  
**Effective Date:** July 5, 2023  
**Next Policy Review Date:** July 2025

## I. POLICY STATEMENT

Howard University (“the University”), as a responsible steward of information collected through its websites in the normal conduct of University business, is committed to protecting the privacy of the information it collects. In support of this effort, the University notifies users and visitors of the rules and regulations pertaining to use of the Howard University websites and online services and provides training to Content Managers who administer University websites and online services.

The *Howard University Online Privacy Notice* (“Privacy Notice”) discloses the University’s practices with respect to the gathering and dissemination of information obtained from users of the Howard University websites. The Privacy Notice describes the types of information the University collects from visitors to its site, what is done with the information, and how users can update and control the use of information provided to the University’s site. The *Howard University Terms of Use* (“Terms of Use”) set forth the University’s expectations regarding conduct, security, site content and maintenance, disclaimers, liability, accessibility compliance, and data privacy. This policy authorizes the Responsible Officer to develop, implement, revise, and monitor the *Howard University Online Privacy Notice and Howard University Terms of Use*, and to review and revise this policy, annually or as needed. The Responsible Officer reserves the right to modify the provisions of the policy, the Privacy Notice, Terms of Use, and other related documents and training.

This policy applies to:

- Sites for which the University is the operator.
- All Content Managers, as defined in this policy.
- All users of and visitors to the Howard University websites.

Use of the University’s websites and online services conveys acceptance of the terms of this policy, Privacy Notice, and Terms of Use. If a visitor does not accept the terms and conditions of this policy, Privacy Notice, and Terms of Use, they should not use the University’s websites, applications, and services.

Howard University is in no way responsible for the privacy practices and content of linked resources, defined as those external to the University's websites, or for any statements, views and opinions expressed by linked resources.

## II. RATIONALE

Howard University is a culturally diverse, comprehensive, research intensive, and historically Black private university with a mission to provide an educational experience of exceptional quality at the undergraduate, graduate, and professional levels.

In furtherance of its mission, the University has a lawful basis to collect, process, use, and maintain information and data of its students, employees, applicants, research subjects, and others involved in the mission of the enterprise. This includes, without limitation, operations related to teaching, admission, enrollment, tuition, transcripts, fundraising, payroll, hiring, public safety, medical and health services, housing, research, financial management, and other enterprise operations not enumerated here.

## III. ENTITIES AFFECTED BY THIS POLICY

This policy applies to The Howard University and all operations, which include:

- Sites for which the University is the operator.
- All Content Managers, as defined in this policy.
- All users of and visitors to the Howard University websites.

## IV. DEFINITIONS

For the purposes of this policy, the following definitions are provided:

- A. Content Managers** - Individuals who are listed in records maintained by the Responsible Office with administrator access to specific sites on the University's websites for the purposes of maintaining, conveying and/or collecting information and data. Content Managers must participate in training (see Terms of Use) related to this policy according to standards set by the Responsible Officer.
- B. Cookies** – Files that the University's websites transfer to a user's web browser to enable the site to deliver personalized services or to provide persistent authentication. Cookies generally contain information which is automatically collected and/or information voluntarily provided by the user.
- C. Delegated Manager(s)** – The individual or individuals designated by the Responsible Officer to implement the provisions of this policy.
- D. Howard University Online Privacy Notice ("Privacy Notice")** – A statement made to users of and visitors to the University's websites that describes how the University collects, uses, retains, and discloses information. The Privacy Notice seeks to comply with the various regulatory requirements governing online, including the *Federal Trade Commission Act*, the *Electronic Communications Privacy Act*, the *Computer Fraud and Abuse Act*, the *Children's Online Privacy Protection Act*, the *Financial Services Modernization Act*,

*Health Insurance Portability and Accountability Act (HIPAA), and the Fair and Accurate Credit Transactions Act.*

The Responsible Officer of this policy shall ensure the Privacy Notice is reviewed annually and may modify its provisions from time to time to comply with regulatory or programmatic requirements without future notice.

The Privacy Notice is available at [howard.edu/privacy](http://howard.edu/privacy).

- E. Personally Identifiable Information (PII)** – Users may be asked for personal information in order to access certain features of the University’s websites, such as name, address, and phone number. Users can choose not to provide this information and not access these features of the University’s websites. Any personally identifiable information provided through the University’s sites are protected according to the provisions of the Privacy Notice.
  - F. Services** – How the University handles and otherwise processes the information it collects, uses, discloses about visitors to and users of its site and linked mobile applications.
  - G. Howard University Terms of Use (“Terms of Use”)** – Guidelines set forth by the University describing the University’s expectations regarding conduct, security, site content and maintenance, disclaimers, liability, and data privacy. The Responsible Officer of this policy shall ensure Terms of Use are reviewed annually and modified from time to time, as needed, to comply with regulatory or programmatic requirements without future notice.
- The Terms of Use are available at [howard.edu/terms](http://howard.edu/terms).
- H. Webform** – An online form allowing a user to enter data that is sent to the appropriate University staff. Webforms must comply with the standards set forth in the Privacy Notice.
  - I. Accessibility Compliance** – The practice of ensuring that web properties are compliant with web accessibility standards.

Howard’s accessibility statement is available at [howard.edu/accessibility-statement](http://howard.edu/accessibility-statement).

## **V. ROLES AND RESPONSIBILITIES**

This policy authorizes the Responsible Officer to develop, implement, revise, and monitor the Privacy Notice and Terms of Use, and to review and revise this policy, as needed.

The Responsible Officer may delegate operational responsibilities related to implementing this policy to a Delegated Manager or Managers in the Howard University Office of Communications.

Various roles and responsibilities related to this Policy are as follows:

**A. Responsible Officer or Delegated Manager(s):**

- a. Compiles and maintains a roster of Content Managers, including the sites' URLs, the name of the relevant office/department, and the name of the Content Manager's supervisor.
- b. Develops and implements training of Content Managers based on industry best-practices and standards.
- c. Tracks successful completion of training for Content Managers. Uses feedback to assure training efficacy.
- d. Establishes and maintains an online mechanism for users to report issues related to content or functionality.

**B. Content Manager:**

- a. Assures the Responsible Officer (or Delegated Manager) receives information regarding the relevant URL, the name of the office/department, the name of their supervisor, and informs the Responsible Officer of any changes to this information.
- b. Reads this Policy and complies with the terms and spirit of the Howard University Online Privacy Notice and the Howard University Terms of Use.
- c. Participates in training, as specified by the Responsible Officer, and provides feedback on the efficacy of the training.
- d. Ensures management of content aligns with best practices, as specified within the content manager training provided by the University, as well as general standards as established in University policies, including, but not limited to, ADA accessibility compliance standards.
- e. Complies with additional training and certification as it pertains to the type of information and data related to the management of their site. This may include HIPAA certification and/or signing a Confidentiality Agreement with the University, as stipulated by the Office of Human Resources and the Office of the General Counsel. The Responsible Officer in collaboration with the Chief Audit and Compliance Officer and the Content Manager's Office/Department will identify additional training requirements on a case-by-case basis.
- f. Successfully completes annual Cybersecurity Training developed by the Enterprise Technology Services (ETS).

### **C. Chief Audit and Compliance Officer:**

- a. Establishes assessment criteria based on the provisions of this policy, the Howard University Online Privacy Notice, and the Howard University Terms of Use and makes recommendations to the Responsible Officer to facilitate compliance.
- b. Assesses the efficacy of Content Managers' training and makes recommendations to the Responsible Officer to facilitate compliance.

## **VI. INTERIM POLICIES**

There are no interim policies.

## **VII. SANCTIONS**

The Responsible Officer, in collaboration with the Chief Audit and Compliance Officer, shall identify Content Managers who do not comply with the provisions of this policy, the Privacy Notice and/or the Terms of Use. On a case-by-case basis, individuals may be provided with a grace period and the opportunity to comply within a specific timeframe.

The Responsible Officer will report persistent violations of this policy to the Content Manager's supervisor and/or Cabinet Officer. The Responsible Officer reserves the right to withdraw the Content Manager's credentials and website access, take down the relevant site, and make recommendations to the appropriate authority for other disciplinary action as set forth in the *Faculty Handbook*, *Student Code of Conduct*, *Employee Handbook*, and other pertinent University policies.

## **VIII. RESOURCES**

Related Documents:

- [Howard University Online Privacy Notice](#)
- [Howard University Terms of Use](#)

Online Resources:

- [Policy Office | Howard University Office of the Secretary](#)
- [Federal Trade Commission Act](#)
- [Electronic Communications Privacy Act](#)
- [Computer Fraud and Abuse Act](#)
- [Financial Services Modernization Act](#)
- [Health Insurance Portability and Accountability Act \(HIPAA\)](#)
- [Fair and Accurate Credit Transactions Act](#)