

University of Washington Information Compliance

Laws and Regulations

UW Policies, Boards and Committees, and Service Providers

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This document was prepared by University of Washington Compliance Services with review by appropriate subject matter experts across the institution.

Introduction

This document surveys the current state of information compliance at the University of Washington. It is one of five parts, with companion reports on research, health and safety, financial, and civil rights and employment compliance. Together, the documents are intended as a resource to support decision making and process improvement across the institution. They catalog the external regulatory framework for higher education compliance, as well as the UW's management and administration of its compliance obligations. The reports focus primarily on Seattle campus operations – including UW Medicine – but include references to UW Bothell and UW Tacoma when and where possible.

Information compliance encompasses a broad array of topics – records retention and management, identity theft prevention, intellectual property, copyrights and trademarks, and export control, among others – and poses numerous operational challenges for institutions of higher education that, like private industry, now depend on technology as the primary mechanism for daily operations. The UW's relevant subject matter experts are committed to safeguarding the privacy and security of the institution's information and data.

Regulatory environment

Laws and regulations

The following is a sample of the many federal, state and local laws and regulations regarding information and information technology with which the University of Washington must comply:

Federal

Arms Export Control Act | 22 U.S.C. § 2778

Charitable Contributions | IRS Publication 526

Charitable Contributions: Substantiation and Disclosure Requirements | IRS Publication 1771

Children's Online Privacy Protection Act (COPPA) | 15 U.S.C. § 6501 *et seq.*

Classified National Security Information Memorandum | Executive Order 13526

Controlled Substances Act of 1970 | 21 U.S.C. § 812

Determining the Value of Donated Property | IRS Publication 561

Digital Millennium Copyright Act (DMCA) | 17 U.S.C. §§ 512, 1201-1205, 1301-1332; 28 U.S.C. § 4001

Electronic Communications Privacy Act | 18 U.S.C. § 2510 *et seq.*, § 2701 *et seq.*, § 3121 *et seq.*

Export Administration Regulations | 15 C.F.R. Parts 730-774

Fair Credit Reporting Act | 15 U.S.C. § 1681 *et seq.*

Family Educational Rights and Privacy Act of 1974 (FERPA) | 20 U.S.C. § 1232g

Federal Information Security Management Act (FISMA) | 44 U.S.C. § 3541 *et seq.*

Genetic Information Non-discrimination Act of 2008 | 42 U.S.C. § 2000ff *et seq.*

Gramm-Leach-Bliley Act | 15 U.S.C. § 6801 *et seq.*; 16 U.S.C. § 313.1 *et seq.*; 16 U.S.C. § 314.1 *et seq.*

Health Information Technology for Economic and Clinical Health Act (HITECH) | 42 U.S.C. § 300jj *et seq.*; 42 U.S.C. § 17921 *et seq.*; 45 C.F.R. Parts 160 and 164

Health Insurance Portability and Accountability Act (HIPAA) | 42 U.S.C. § 300gg; 29 U.S.C. § 1181; 42 U.S.C. § 1320d *et seq.*

Higher Education Opportunity Act | 20 U.S.C. § 1092

International Traffic in Arms Regulations | 22 C.F.R. Parts 120-130

Red Flags Rule | 16 C.F.R. Part 681.2

Sonny Bono Copyright Term Extension Act of 1998 | 17 U.S.C. § 304

Trademark Act of 1946 (Lanham Act), amended by the Trademark Revision Act of 1988 | 15
U.S.C. § 1051 *et seq.*

U.S. Patent Act | 35 U.S.C. §§ 1-39

State

Title 5 RCW – Evidence

Chapter 5.60.060: Who is disqualified – Privileged communications.

Title 19 RCW – Business Regulations – Miscellaneous

Chapter 19.255: Personal information – Notice of security breaches.

Title 24 RCW – Corporations and Associations (Nonprofit)

Chapter 24.55: Prudent management of institutional funds act.

Title 40 RCW – Public Documents

Chapter 40.14: Preservation and destruction of public records.

Title 42 RCW – Public Officers and Agencies

Chapter 42.30: Open public meetings act.

Chapter 42.32: Meetings.

Chapter 42.48: Release of records for research.

Chapter 42.56: Public records act.

Title 49 RCW – Labor Regulations

Title 63 RCW – Personal Property

Chapter 63.14: Retail installment sales of goods and services.

Title 70 RCW – Public Health and Safety

Chapter 70.02: Medical records – Health care information access and disclosure.

Government agencies

Selected federal, state and local governmental agencies responsible for promulgation and/or enforcement of the laws and regulations cited above include:

Federal

Department of Commerce

Department of Education (ED)

Department of Health and Human Services (HHS)
Department of Justice
Department of State
Federal Trade Commission (FTC)
National Institutes of Health (NIH)
Office of Management and Budget (OMB)
United States Copyright Office
U.S. Equal Employment Opportunity Commission (EEOC)

State

Department of Health
Department of Labor and Industries (L&I)
Department of Social and Health Services (DSHS)
Secretary of State, Division of Washington State Archives
Washington State Attorney General
Washington Student Achievement Council

Other

Financial Accounting Standards Board (FASB) (Generally Accepted Accounting Principles, or GAAP); Government Accounting Standards Board (GASB)
National Council for State Authorization Reciprocity Agreements (NC-SARA) (distance education)
Payment Card Industry Security Standards Council (PCI DSC) (payment card security)

Accreditation

Accreditation – essentially a close “cousin” of higher education compliance – is an evaluative process which ensures that institutions, and their academic programs and discrete organizational functions, are aligned with standards and practices established by the nation’s top colleges and universities. That process is managed by private, not-for-profit entities, known as accreditors, created to conduct external quality assessments. These assessments take the form of peer review. Such review, coupled with regular reporting by institutions (usually at specified intervals), provides accreditors with relevant information and data, and elicits evidence of accreditation’s primary mandate: continuous improvement.

Regional or national accreditation encompasses an entire institution and all aspects of its operations. Specialized (sometimes known as programmatic) accreditation relates to academic programs or disciplines such as nursing, physical therapy, engineering, business, and teacher education. It also relates to university departments or units and their specific functions and practices, such as scientific diving, animal care and use, and research with biohazardous agents.

Specialized accreditation, with regard to *academic programs*, ensures that institutional governance and resources, curricula, teaching and learning assessment practices, and achievement of program outcomes meet accreditors' expectations for quality. It is relevant to many UW academic programs in the health and science fields (e.g., those in the Department of Speech and Hearing Sciences, the School of Pharmacy, or College of Engineering). Specialized accreditation is optional for some academic programs, and mandatory for others.

Accreditation of *specific functions* is usually relevant to activities which present health and safety concerns, such as laboratory pathology or rehabilitation medicine. Specialized accreditation in this realm relies on subject matter experts working across disciplines or fields and is predicated on adherence to standards set by leaders in business, industry, healthcare and/or higher education. In the health and safety area, recognition by a specialized accreditor implicitly acknowledges the adoption of established best practices for professionals and organizations working with viruses or laboratory animals, for example. Specialized accreditation is optional for most university functions or activities, but a lack thereof can produce concerns among funding agencies and the general public.

Failure to maintain compliance with accreditation principles or guidelines can result in warnings, probation, or revocation of accreditation in extreme cases. Such failure carries with it similar concerns as those in the compliance realm, e.g. closure of an academic program, damage to an institution's reputation, loss of student enrollment, loss of public trust, etc. Thus, adherence to accreditation standards is essential for the continued operations of a large research university.

Regional accreditation:

- Northwest Commission on Colleges and Universities (NWCCU)

Selected specialized or programmatic accreditors:

- Library and Information Sciences: American Library Association (ALA)
- Engineering and technology programs: Accreditation Board for Engineering and Technology (ABET)
- Nursing: Commission on Collegiate Nursing Education (CCNE)
- Medical Centers: The Joint Commission on Accreditation of Healthcare Organizations, known as the Joint Commission (JCAHO)

UW boards and committees

The documented boards and committees currently providing guidance and oversight with regard to information compliance practices on the University of Washington's Seattle campus – including UW Medicine – are described below (in alphabetical order).

Advisory Committee on Faculty Code and Regulations

In accord with the Constitution of the Faculty Senate, the committee shall: 1) report to the Senate Executive Committee the changes it recommends for proposed amendments to the Faculty Code; 2) render advisory opinions on interpretations of the Faculty Code; 3a) draft proposed additions to or amendments of UW regulations at the request of the Senate, a faculty council or committee, or member of the Senate, 3b) consult upon the meaning of University regulations or upon the status of existing rules governing individual situations, 3c) recommend revision or clarification of University regulations.

Membership: Committee members all hold faculty status, and change from year to year.

Law/regulation: None

UW policy: Section 22-61, Faculty Code (Advisory Committee on Faculty Code and Regulations)

Intellectual Property Management Advisory Committee (IPMAC)

IPMAC advises the UW President on intellectual property (IP) issues that arise in the protection and promotion of research and on the IP policy itself. IPMAC is complemented by the Faculty Senate's Special Committee on Intellectual Property and Commercialization. These committees coordinate in addressing major topics regarding the ownership, stewardship, and management of intellectual property at the UW, but act independently of each another.

Membership: Per EO 36, the committee shall consist of no fewer than five members, a majority of whom are chosen from the faculty.

Law/regulation: None

UW policy: EO 36 (Patent, Invention, and Copyright Policy)

IT Service Investment Board

The IT Service Investment Board:

- Reviews services provided by UW Information Technology (UW-IT) and make recommendations for adding, changing and removing services. As part of this review, the Board considers service costs, funding levels and support of strategic goals as outlined by the IT Strategy Board. The Board also considers input from the IT Service Management Board when making recommendations.

- Conducts an annual review and assessment of the Technology Recharge Fee (TRF) and recommend changes as needed. This review includes evaluation of services to be covered, costs to provide those services, rate level and allocation methodology.
- Prioritizes major UW-IT projects that enhance or add IT services and make recommendations about funding levels to the Vice President for UW-IT and CIO.
- Refer issues and recommendations to the IT Strategy Board as needed.

The IT Service Investment Board has purview over all services provided by UW-IT, including services currently not covered through the TRF, such as Information Management and Self-sustaining Services. Also in scope are major projects that support or enhance those services, that deprecate existing services or that implement new services.

Membership: The board is made up of thirteen representative Chancellors, Deans, Vice Presidents and Vice Provosts, or their designated direct reports.

Law/regulation: None

UW policy: None

IT Service Management Board

The Board focuses on the operational coordination of information technology (IT) services at the UW. The scope of the IT Service Management Board encompasses the services in the UW-IT Service Catalog, including end user-facing services and services intended for campus IT staff. The Board:

- Ensures alignment of UW-IT services with UW strategy and priorities, based upon strategic direction received from the IT Strategy Board and prioritization from the IT Service Investment Board.
- Optimizes the design, delivery, operation, and sourcing of IT services.

Membership: The board is made up directors, managers, and other senior administrative leaders in finance, business services, and information technology.

Law/regulation: None

UW policy: None

IT Strategy Board

The purpose of the IT Strategy Board is to:

- Review key developments in information technology for potential impacts to, and adoption by, the University of Washington.
- Recommend critical opportunities and actions that will best position the UW to adopt strategic information technologies to support and advance its teaching, learning, research and service missions.

- Review the breadth and scope of the UW’s information technology portfolio to recommend appropriate investments in new capabilities to support the University’s core missions, and to realize efficiencies and cost savings in its business operations.
- Make recommendations to the President and Provost about strategic plans, policies and funding priorities for information technology at the University.

The scope of the IT Strategy Board encompasses all activities of UW Information Technology, including major projects, service improvements, and infrastructure investments. In addition, the IT Strategy Board makes recommendations about University-wide IT strategies, investments, projects and initiatives.

Membership: Members include senior leaders from UW academic and administrative units.

Law/regulation:

UW policy:

Information Security and Privacy Board (ISPB)

This group makes recommendations to the Executive Office on information security and privacy; reviews risks, capabilities, and network trends; evaluates risk mitigation strategies; reviews and recommends records that should be protected from disclosure for information security and privacy reasons; and, reviews incident and breach trends, and insurance claims.

Membership: Members include senior leaders from UW academic and administrative units

Law/regulation: None

UW policy: None

Privacy Assurance and Systems Security (PASS) Council

The group:

- Develops, implements and maintains University-wide strategic plans for information security and privacy;
- Develops, implements and maintains University-wide information security and privacy policies, standards, guidelines, and operating procedures related to University technology and institutional information in any form (i.e., electronic or paper)
- Approve information security and privacy policy exceptions;
- Coordinate compliance requirements related to information security and privacy laws and regulations that impart a duty upon the University;
- Oversee related institutional risk issues and provide appropriate recommendations in support of the University’s larger risk management programs and initiatives; and,
- Recommend risk mitigation and control processes for information security and privacy incidents.

Membership: Senior leaders and management staff representing key areas of the University

Law/regulation: None

UW policy: APS 2.4 (Information Security and Privacy Roles, Responsibilities and Definitions)

Special Committee on Intellectual Property and Commercialization (SCIPC)

This Faculty Senate committee is charged with reviewing UW policies and practices related to faculty intellectual property, including its management and commercialization. Note: in April 2016, a written motion to the Senate Executive Committee was approved to terminate this committee (and, on the date that committee is terminated by the President, the IPMAC as well) and create a new committee with the suggested name of Advisory Committee on Intellectual Property Policy and Practice.

Membership: Unknown

Law/regulation: None

UW policy: None

Student Records Committee

The Student Records Committee is appointed by the University president and reviews unusual requests for information and for assisting with interpretations of Chapter 478-140 WAC, the rules and regulations governing student education records at the UW.

Membership: Unknown

Law/regulation: None

UW policy: WAC 478-140-019 (Student records committee.)

Technology Recharge Fee (TRF) Advisory Committee

The purpose of the Technology Recharge Fee (TRF) Advisory Committee is to support the IT Service Investment Board in its annual review and assessment of the Technology Recharge Fee by providing analysis, identifying issues, and making recommendations. The TRF Advisory Committee will provide analysis, identify issues, and make recommendations on components of the annual TRF, including evaluation of the services to be covered, costs to provide those services, rate levels, and allocation methodology. This may include a review of services currently not covered by the TRF, including those provided by Information Management and self-sustaining services.

Membership: Committee members represent academic and administrative units, including UW Medicine, across the Seattle campus.

Law/regulation: None

UW policy:

UW Medicine Security Program Executive Committee (SPEC)

The SPEC provided oversight and direction for the information security program strategy and execution; it serves as the senior executive advisory group to the UW Medicine Chief Health System Officer for information security risks and is the point of accountability for the information security program. Its responsibilities include the following:

- Approve the UW Medicine (UWM) information security strategic plan and review/revise biannually.
- Ensure information security strategy and expectations are in alignment throughout UWM entities and address pertinent changes in laws, regulations, threat landscape and technology environment.
- In coordination with the IT Strategic Oversight Committee (ITSOC), advise on priorities, plans, and resources for implementing the technical infrastructure in a manner consistent with the information security strategy.
- Evaluate risk mitigation strategies for UWM and recommend approval of risk acceptance to the UWM Chief Health System Officer.
- Review risks and threats in order to identify areas of concern and recommend critical actions needed to support the UWM mission.
- Review incident and breach trends.
- Partner with UW Campus IT and Office of the Chief Information Officer on global information security initiatives that impact UWM.

Membership: Appointed by the UW Medicine Chief Health Systems Officer (CHSO)/VPMA, members represent units and departments across UW Medicine

Law/regulation: None

UW policy: None

Designated information officials and their roles

Privacy

Ann Nagel, Associate Vice Provost of Institutional Privacy | Institutional Privacy Official

Privacy (UW Medicine)

Sue Clausen, Chief Compliance Officer & Associate Vice President of Medical Affairs, UW Medicine | Chief Privacy Officer, UW Medicine

Public records

Eliza A. Saunders, Director, Office of Public Records and Public Meetings | Public Records Officer

Regional accreditation

Patricia Moy, Associate Vice Provost for Academic and Student Affairs & Christy Cressey Professor of Communication | Accreditation Liaison Officer

School official (under the Family Educational Rights and Privacy Act, or FERPA)

A “school official” includes academic personnel, president, chancellor, board member, trustee, registrar, counselor, admissions officer, attorney, accountant, human resources professional, information systems specialist, and support or clerical personnel. A contractor, consultant, volunteer, or other party to whom a school or institution has outsourced institutional services or functions may also be considered a “school official” provided that they are performing an institutional service or function for which the agency would otherwise use employees and is under the direct control of the agency or institution with respect to the use and maintenance of education records.

University records

Barbara Benson, Director, Records Management Services | University Records Officer

Christine Taylor, Director, UW Medicine Records Management Services | UW Medicine Records Officer

UW service providers

Although many University administrative departments integrate protocols for the dissemination of information, and for purposes related to security and privacy, the following offices provide centralized management and coordination of such services campus wide.

Enrollment Management

The Division of Enrollment Management provides leadership, expertise, analysis and coordination for undergraduate enrollment-related areas including recruitment and outreach efforts, application and admission policies, financial aid and scholarship policies, student retention and attrition studies, student outcomes, institutional competitiveness, and overall enrollment planning. Offices include: Enrollment Information Services, Student Financial Aid, International Student Services, Student Financial Aid, Undergraduate Admissions, University Registrar, and the Veterans Center.

Human Resources

HR Information Systems (HRIS) provides UW Human Resources and the UW community with tools, guidance, and systems support to manage HR information in a secure, efficient, and effective manner. Services include:

- Public Records and HR Data Requests: Accessing, analyzing, and providing HR data is a core service of HRIS. Data requests for public records requests flow through the process established in collaboration with the Office of Public Records.
- HR Solutions: Information systems planning and integration, including case management solutions for labor, violence prevention, disability services, benefits, compensation and employee relations, and the event registration system for The Whole U.
- HR/P: The HRIS team is fully engaged in the implementation of Workday as analysts, integration engineers, report writers, architects and project managers.

Information Technology

Chief Information Security Officer, Office of the

The Office of the CISO uses an “assumption of breach” methodology to support the University balance risks and create situational awareness about critical information assets and sophisticated cyberattacks. The Assumption of Breach Practices include:

- Adopt a repeatable risk management framework for reporting and prioritizing work efforts.
- Document and assess the value of critical data assets, technology services, people, business relationships, and partners.

- Prioritize assets and related risk-mitigation efforts that make the most sense based on available resources.
- Establish clear responsibility and communication plans for information security and privacy, including incident response.
- Enable innovation and control contract risk with fair, clear, and practical terms and conditions that reduce liabilities related to asset loss or compromise.
- Implement an intelligence program based on reliable sources for evolving threats, incidents, industry trends, adversary profiles, and related analysis.
- Establish a network of trusted strategic partners and experts.
- Implement “advanced” incident response and management capabilities and tools.
- Minimize the electronic attack surface for all critical assets.
- Explore options for responding to and defending against intrusions.

Information Management provides University-wide leadership in the development and management of UW’s major administrative business systems, including Finance, Human Resources/Payroll, Advancement and Facilities. This division is responsible for:

- Enterprise Administrative Applications: Provides enterprise software—custom and commercial—to support the business processes of UW Advancement, Environmental Health and Safety, Finance and Facilities and the Office of Planning and Budgeting.
- Enterprise Document Management: Supports the University’s modernization goals by helping departments to create and manage electronic documents, automate business processes, comply with records retention policies and acquire electronic signatures.
- Enterprise Information, Integration & Analytics: Delivers institutional data for decision-making to UW academic and administrative units, and is responsible for data integration, data design and architecture, metadata management, data science and business intelligence. Manages the enterprise integration platform, the Enterprise Data Warehouse, enterprise web services, and business intelligence systems and solutions, and provides training.
- HR/P Intersections: Supports the HR/Payroll Modernization initiative, including modifications to enterprise financial and student administrative systems and the Enterprise Data Warehouse, as well as development of enterprise integration capabilities aligned with the Enterprise Information Management initiative. Provides support for the UW’s HR/Payroll administrative systems.

Internal Audit

Internal Audit engages in three primary activities – audits, management advisory services, and investigations. Its focus is to actively work with the schools, colleges and the UW Medicine clinical entities to assist management in addressing strategic, financial, operational, and

compliance risks and exposures. Internal Audit focuses on both university-wide and departmental level processes and control systems.

Planning & Budgeting, Office of

The Office of Planning & Budgeting (OPB) supports the UW community in accomplishing its goals through the planning and allocation of financial and physical resources, and by providing analysis and information services to enhance university decision-making, planning and policy formation. OPB reports to the Provost.

Public Records and Open Public Meetings, Office of

The office oversees the University's compliance with the Washington state public records law and the open public meeting act to assure citizens of our state transparency and access to government.

Records Management Services

Records Management Services manages and oversees compliance with state and federal laws and regulations relating to the preservation and destruction of information created and received by the UW. The program is the legal authority, designated by the UW and by the State of Washington, to determine how long electronic and paper records and information must be retained. The office is responsible for developing Records Retention Schedules and establishing standards, relating to University business requirements and needs, which ensure the legal legitimacy of University record-keeping systems. The program counsels and advises the University administration on the implementation of policy and procedure which promotes adherence to these standards and minimizes risk. It provides a wide range of services which are designed to help ensure the University is meeting its record-keeping responsibilities.

Records Management Services (UW Medicine)

UW Medicine Records Management Services is charged with complying with federal, state and local laws regarding electronic and paper records management, destruction and preservation; developing legal retention periods for UW Medicine records; and developing policies, procedures and standards, for the capture and management of the trusted and authentic record. Other services include: storage, maintenance, appraisal and destruction or permanent retention of business records; on-site consultation for records review regarding retention and organization; guidelines for scanning records; and assistance with the application and interpretation of the two Records Retentions Schedules which govern UW Medicine records - the Washington State Government General Records Retention Schedule Version 6.0 and the UW Medicine Records Retention Schedule Version 1.6.

Research Information Services, Office of (ORIS)

ORIS leverages technology, data, information and collaboration to support research capabilities and further the research enterprise. ORIS supports data-driven decision making through unlocking, simplifying, and sharing information hidden in Research Administration Data (RAD).

UW Medicine Compliance

UW Medicine Compliance develops and maintains hospital and clinic compliance programs for Harborview Medical Center, Northwest Hospital & Medical Center, Valley Medical Center, UW Medical Center, UW Neighborhood Clinics, and Airlift Northwest for the following areas: clinical billing and documentation, privacy, identity theft prevention, and the Emergency Medical Treatment and Labor Act (EMTALA).

UW Privacy Office

Established in early 2017 to develop, implement, and manage a strategic privacy program across the UW to support organizational areas that implement and manage operational and tactical aspects of privacy through their organization functions. An essential element of the privacy program is the development of privacy values, principles and a risk balancing process that provides proactive direction, guidance, and support for all aspects of privacy for the UW.

UW policies

Listed below are relevant Administrative Policy Statements, Presidential Orders, and Washington Administrative Code sections, that support and guide information compliance at the University of Washington. A sample of additional policy sources is also included in this section.

Administrative Policy Statements (APS)

APS 1.5	Open Public Meetings Act: Requirements to File Meeting Notices
APS 2.2	University Privacy Policy
APS 2.4	Information Security and Privacy Roles, Responsibilities and Definitions
APS 2.5	Information Security and Privacy Incident Reporting and Management Policy
APS. 2.6	Information Security Controls and Operational Practices
APS 13.1	Emergency Management
APS 13.2	Ensuring Business, Academic, and Research Continuity (BARC)
APS 13.4	Guidelines for Building Coordinators
APS 35.1	Compliance Policy for Payment Card Industry Data Security Standards
APS 35.2	Identity Theft Prevention: Red Flag Rules
APS 57.9	Departmental Guidelines for the Release of University Records
APS 57.11	Records Management Services
APS 59.4	Technology Transfer

Presidential Orders

Executive Orders (EO)

EO 36	Patent, Invention, and Copyright Policy
EO 46	Guidelines for University Reporting to the Office of Immigration and Naturalization Service about International Students Holding F-1 (Student) Visas
EO 63	The Vice President for UW Information Technology and Chief Information Officer

Washington Administrative Code (WAC)

Chapter 478-140 WAC	Rules and regulations for the University of Washington governing student education records.
Chapter 478-168 WAC	Regulations for the University of Washington libraries.
Chapter 478-250 WAC	Governing indexing of public records.

Other policy sources

The official policies listed above have University-wide application and are therefore centrally reviewed, approved and maintained, with support from the Rules Coordination Office.

A number of departments and administrative units have established local policies, some with corresponding procedures and relevant committees, to help fulfill key information compliance obligations. Numerous training and/or informational manuals, guides, and plans – that may function as *de facto* policy – are also maintained on the three UW campuses and at UW Medicine. A sample of these sources is below.

Grants Information Memoranda (GIM)

- [GIM 1](#) Review and Submission Requirements for Proposals
- [GIM 8](#) Subrecipient Monitoring
- [GIM 29](#) Release of Data Included in Proposals
- [GIM 37](#) Research Data
- [GIM 39](#) Closeout of Sponsored Programs

[Acceptable Use Standard – Husky ID Card and Husky ID Card Data](#)

[Confidential Data Risk Guide](#)

[Email Management](#)

[Guide to Appropriate Use of Social Security Numbers](#)

[Information Security Guideline](#)

[IT: Appropriate Use](#)

[Departmental Retention Schedules](#)

[University General Records Retention Schedule](#)

[Social Security Number Standard](#)

[University of Washington Trademark and Licensing Policies](#)