



University of Colorado

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eComm Policy

University Relations, Office of the President

Brief Description:

Establishes policy and parameters for use of the eComm program (Salesforce, Marketing Cloud, and Cvent) at the University of Colorado.

Effective:

July 1, 2018

Approved by / Responsible University Officer:

Vice President of Communication Ken McConnellogue

Responsible Office:

CU System University Relations

Policy Contact:

The Vice President for Communication or Executive Director of Electronic Communication will respond to questions and provide guidance regarding interpretation of this policy.

Last Reviewed/Updated:

July 1, 2018

Applies to:

Users of the eComm platform (Salesforce, Marketing Cloud, and Cvent)

CONTENTS

[Introduction](#)

[Policy Statement](#)

[Procedures](#)

[Guidelines](#)

[Audience](#)

[Accessibility](#)

[Best Practices](#)

[Branding](#)

[CAN-SPAM](#)

[Data](#)

[Privacy](#)

[Server Loads and Send Times](#)

[Exceptions](#)

[Violations](#)

[Related Policies](#)

[Administrative Policy Statements](#)

[Other Policies](#)

POLICY STATEMENT

I. INTRODUCTION

The university provides electronic communications resources to support its work of teaching, scholarly research, public service, advancement, and constituent engagement. Communications shall be coordinated to provide relevant and timely information to the appropriate audiences and crafted with the needs and email preferences of the audience foremost.

This policy is written with an understanding that all communicators at CU are part of a larger ecosystem in which constituents represent multiple types and affiliations. Communicators shall recognize the depth and complexity of relationships that constituents have with CU and shall use data, best practices, training, resources, and collaboration accordingly to create meaningful, engaging communications that strengthen constituent relationships with the University.

II. POLICY STATEMENT

The [eComm Program](#) (Salesforce, Marketing Cloud, and Cvent) is the preferred platform and only supported tool for marketing communications at CU. The program protects the operational integrity, value, and availability of university communications, constituent data, campus networks, security, and electronic communications services. Mass audience and bulk email communications shall be sent via eComm or receive an [exception](#).

III. PROCEDURES

A. Guidelines

1. Audience

eComm shall support communicators with tools to communicate with audiences defined by their functional area, also known as a constituent audience. Sends to any audience shall have a legitimate and strategic business purpose that collaborates within the larger CU ecosystem. If a legitimate and strategic

business purpose cannot be demonstrated, an exception shall be required. When communications target lists beyond constituent affiliation (e.g. cross-campus program promotions), they shall be assessed and approved or denied via the exception process.

2. Accessibility

Communications shall be crafted to respect accessibility concerns and meet [Accessibility of Information and Communication Technology](#) policy stipulations.

3. Best Practices

Communications shall be sent in accordance with the [best practices](#) outlined on the eComm website.

4. Branding

Communications shall be crafted in accordance with System and campus [brand identity standards](#).

5. CAN-SPAM

All commercial communications sent via eComm shall exclude an unsubscribe/opt-out report to ensure compliance with [CAN-SPAM](#) and that email preferences are honored. Do Not Email and Do Not Contact flags for external audiences are respected in audience definitions.

6. Data

CU shall own all constituent data, regardless of where it is housed or the unit that creates/maintains it. In some cases, units' constituent data shall be shared and included in communications distributed to a broader interested audience (i.e., the President's electronic newsletter).

7. Privacy

FERPA privacy flags shall be respected in all communications; constituents with these flags shall only receive email messages related to educational business. Audiences defined by protected classes – Office of the Registrar, Strategic Relations and Communications and the Office of Institutional Equity and Compliance - shall be excluded from communications as deemed appropriate. Other federal laws, including HIPAA, shall be respected in content and execution.

8. Server Loads and Send Times

Users shall throttle their send rate in order to balance server loads. Send rates shall not exceed five messages per second. Messages to audiences containing over 10,000 university email addresses shall be sent outside normal business hours.

B. Exceptions

When a unit determines a unique need to use a system other than eComm to distribute electronic communications, they shall apply for an exception to the policy from their campus Vice Chancellor or Chancellor. Criteria for exemptions include the following:

1. Emailing fewer than 200 people (third-party paid services are not an acceptable alternative for ongoing communication to small audiences).
2. Sending no more than two communications annually.
3. Constituent data required for targeted messaging cannot be incorporated into Salesforce in a reasonable time period.
4. Security issues prevent shared visibility of communications.

The exception shall be granted for a period of one-year and shall be outlined in a Memorandum of Understanding between the operational unit, the campus Vice Chancellor or Chancellor, and the Office of the President.

When appropriate, a scope of work and functional requirements shall be drafted to create a roadmap to integrate the unit into the eComm program. Additionally, the unit shall send communications preferences (opt-out, opt-in, interests) data back to the university's Central Information Warehouse (CIW) and shall incorporate opt-out data from the CIW to ensure compliance with CAN-SPAM and that email preferences are honored.

C. **Violations**

Individuals using the eComm platform shall do so in accordance with this policy and the applicable associated procedures. Students may be subject to discipline under the Student Code of Conduct on their campus for violations of this policy. Employees or their managers may be subject to employee discipline for violations of this policy.

eComm licenses may be revoked for any of the reasons below. Should it be determined that a license must be revoked, the Office of the President will communicate with the campus Vice Chancellor or Chancellor so that appropriate action can be taken.

1. Failure to complete and/or update Data Security Training and PCI Training
2. Failure to complete New User Training
3. Breaches of data security, including sharing licenses, exporting data from source systems and storing it locally, or other violations of data security (including exporting constituent data)
4. Repeated (three or more) CAN-SPAM violations or repeated disregard for email preferences
5. Repeated (three or more) violations of branding
6. Lack of login/use within a nine month time period

IV. **RELATED POLICIES**

A. **Administrative Policy Statements (APS)**

[APS 4014 - Fiscal Roles and Responsibilities](#)

[APS 2006 - Retention of University Records](#)

[APS 6001 - Providing and Using Information Technology](#)

[APS 6002 - Electronic Communications](#)

[APS 6010 - Data Governance](#)

B. Other Policies

[Accessibility of Information and Communication Technology](#)

[Branding Policies for System and Campuses](#)

[Controlling the Assault of Non-Solicited Pornography and Marketing](#)

[Act of 2003 \(CAN-SPAM\)](#)

[Family Education Rights and Privacy Act \(FERPA\)](#)