

SUNY Downstate Health Sciences University
POLICY AND PROCEDURE

Department: Information Services

Subject: Web Policy Guidelines

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Implementation Date:

Approved by: _____

Distribution: Administrative Manual
 Department Manual
 Patient Care Manual
 AOD Manual
 Campus Manual

I. Purpose:

The SUNY Downstate Health Sciences University website has been established to aid the educational, research, patient care, community service, and administrative activities of the center, and to foster communication both within the Downstate community and to its external constituencies.

The *Web Policy Guidelines* specify procedures for use and for the creation, design, development, and maintenance of SUNY Downstate's website.

II. Policy:

All users of Downstate's website must adhere to the Procedures and Guidelines outlined in this document.

SUNY Downstate Health Sciences University's website is one of its most visible and widely used communication tools. It plays a key role in how SUNY Downstate brands itself, and how external and internal audiences view the institution. It is important therefore that Downstate's website reflects the institution's multiple missions, and that it does so in a consistent, cohesive, and professional manner.

To facilitate this:

- 1) All content that that specifies or implies SUNY Downstate's institutional priorities, perspectives, commitments, or mission must conform to the communications priorities and strategies of SUNY Downstate, as specified by the Office of Institutional Advancement on behalf of the President's Office;

- 2) Content and use must conform to the publishing guidelines and Principles of Acceptable Use” delineated in this document;
- 3) Design of all web pages must conform to the templates established by Information Services and Biomedical Communications, and to Photo Policy and Editorial Style Guidelines established by Institutional Advancement; and
- 4) Users must adhere to all applicable federal, state, and SUNY regulations, including Executive Order 1 (*Establishment of Ethical Conduct Guidelines*, Office of the Governor, January 1, 2007).

III. Procedures/Guidelines

The SUNY Downstate Health Sciences University server is intended exclusively for the service of web pages on behalf of Downstate’s education, research, patient care, and community service programs.

SUNY Downstate’s website organizes institutional resources for the use of Downstate students, faculty, staff, alumni, and other external audiences, and is designed to provide clear and accurate information about Downstate to internal and external audiences. These include, but are not limited to, Downstate students, faculty, staff, and alumni; prospective students; prospective and current patients; community members; key opinion leaders; local and state elected officials; journalists; and donors.

Web pages are managed by individual departments and programs. Material served without password or other restriction is publicly available.

All SUNY Downstate web pages published on the Downstate server must conform with the principles delineated in Executive Order #1 (*Establishment of Ethical Conduct Guidelines*, Office of the Governor, January 1, 2007), which prohibits the use of State resources for nongovernmental purposes, including personal purposes and outside activities. They must also conform as follows:

III.A. PRIVACY, COPYRIGHT, HIPAA, AND FERPA REGULATIONS

1. Web Server Privacy Policy

SUNY Downstate Health Sciences University is committed to protecting the privacy of all visitors to its web site to extent permitted by law.

See SUNY Downstate “Internet Privacy Statement.”

2. Digital Millennium Copyright Act Compliance

All Downstate web users and authors are required to respect the copyrights in works that are accessible through computers connected to the SUNY Downstate network. Under federal copyright law, no copyrighted work can be copied, published, disseminated, displayed, performed, or played without permission of the copyright holder, except in accordance with fair use or licensed agreement. This includes music, movies, and other copyrighted material. The Downstate Webmaster reserves the right to immediately remove materials that have been identified as potential copyright violations, and to immediately terminate accounts violating copyright law.

Downstate Web authors must verify the ownership of any form of media (text, graphics, audiovisuals, and so forth) used in Downstate sites, and obtain written permission from the content owner before posting the material on any Downstate Web server.

3. HIPAA Security and Privacy Policies

Downstate Web authors must comply with all HIPAA security and privacy regulations for Protected Health Information (PHI). No PHI can be posted on any Downstate institutional Web server. This includes photos of patients. No photo of a patient can be placed on the web without a signed institutional HIPAA authorization form that approves use of the photo on the web. Signed authorization forms must be kept in the patient's record and a copy sent to Institutional Advancement (Box 2; BSB 1-101), along with an electronic version of the photo (mediaone@downstate.edu).

The Downstate Webmaster reserves the right to immediately remove materials that have been identified as potential PHI violations, and to immediately terminate accounts in violation of SUNY Downstate HIPAA policies.

See "Attachments" for HIPAA policies.

4. Family Educational Rights Privacy Act (FERPA)

Downstate Web authors must comply with FERPA, which protects the privacy of educational records of current and former students. FERPA requires that information about individual Downstate students not be disclosed without the express written consent of the student. This includes, for example, sex, grades, student numbers, race/ethnicity/nationality, and social security number. Disclosure of "directory information" (name, address, phone number, email, dates of attendance, major) can be posted, although students have the right to disallow such disclosure.

Before posting student information on the Downstate website, web authors should check with the Registrar's Office to confirm the information is allowable under FERPA and that the student hasn't opted out of the Student Directory.

Except when used in a news venue format, no photos of identifiable students should appear on the web without model release forms being signed.

See "Attachments" for Photo Policy.

III.B. PUBLISHING POLICIES

1. Access to Publishing

Any officially recognized Downstate office, project, program, or student organization may publish on Downstate's web servers in accord with the guidelines described in this document. Student organizations must be officially recognized by Downstate to be granted publishing access.

2. Publishable Information

Only information relative to Downstate's mission and programs can be posted on the Downstate website. Such information includes, but is not limited to, information approved by SUNY Downstate Health Sciences University departments, offices, projects, programs or areas for publication on the Downstate website. Student organizations may also publish home pages, provided the organization has been approved by the Director of the Student Center.

Content that specifies or implies SUNY Downstate's institutional priorities, perspectives, commitments, or mission must conform to Downstate's communications priorities, as established by the Office of Institutional Advancement on behalf of the President's Office.

Personal pages, or their linkages, are not permitted on Downstate's website without prior approval from the Office of Institutional Advancement. In granting such approval, the Office of Institutional Advancement will consider the following factors:

- The individual, organization, or entity is connected to Downstate through enrollment or employment;
- The link or webpage is substantively and primarily educational in nature;
- The link or webpage will enhance SUNY Downstate's mission;
- The creation of a link or webpage will not provide an inappropriate or unacceptable privilege to a Downstate-affiliated individual over other members of the public.
- Any commercial benefit to the Downstate-affiliated individual is incidental;
- The link or webpage must be approved by the sponsoring department;
- Upon approval of the sponsoring department and the Office of Institutional Advancement, the SUNY Downstate policy disclaimer, as delineated on "Linking Policy," must appear to the user upon leaving the SUNY Downstate webpage.

If approval is not granted, or if there is a policy issue, Institutional Advancement may convene a review committee to examine the issues and give the individual the opportunity to make the case for linkage or creation of a webpage. The review committee may include a representative from Institutional Advancement, Information Services, the Department of Management Systems, the sponsoring department and, as necessary, Academic Administration, and the Chief Medical Officer or other physician representative. The committee will have the discretion to deny, grant, modify, impose conditions upon the linkage or webpage, or if appropriate, refer the matter to the New York State Ethics Committee for review.

3. Publishing Guidelines for Acceptable Use

Members publishing on the web servers must abide by the following principles of acceptable use.

Principles of Acceptable Use:

SUNY Downstate staff are required to:

- Respect the privacy of other users. For example, users shall not intentionally seek information on, obtain copies of, or modify files or data belonging to other users, unless explicit written authorization to do so has been obtained.
- Respect the legal protection provided to programs and data by copyright and license.
- Protect data from unauthorized use or disclosure as required by state and federal laws/regulations.
- Respect the integrity of computing systems. For example, users shall not use or develop programs that harass other users; infiltrate a computer or computing system; and/or damage or alter the software components of a computer or computing system.
- Safeguard their accounts and passwords. Any user-changes of passwords must follow published guidelines for good passwords. Accounts and passwords are normally

assigned to single users and not shared with any other person without express, written authorization. Users must report attempted security violations to Information Services.

Unacceptable Use:

SUNY Downstate web publishers cannot use the web servers:

- For non-governmental purposes as noted in Executive Order # 1, and defined herein.
- For activities unrelated to or inconsistent with SUNY Downstate's mission;
- For activities unrelated to official assignments and/or job responsibilities;
- For any illegal purpose;
- To transmit threatening, obscene, or harassing materials or correspondence;
- For unauthorized distribution of SUNY Downstate data and information;
- To interfere with or disrupt network users, services, or equipment;
- For private purposes, such as marketing or business transactions;
- For solicitation, including but not limited to personal, religious, or political purposes.
- For unauthorized not-for-profit business activities;
- For private advertising of products or services; and
- For any activity meant to foster personal gain or enterprise.

4. Non-Commercial Policy

SUNY Downstate Health Sciences University resources cannot be used to create Web pages for personal business or personal commercial gain. Advertising external commercial enterprises on the Downstate server or product endorsement is not allowed. Content must be limited to the academic or professional role of the department, program, or individual at SUNY Downstate Health Sciences University.

Reference on SUNY Downstate's website to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not constitute or imply its endorsement, recommendation, or favoring by SUNY Downstate Health Sciences University.

5. Closing of Accounts and Removing Web Pages

Information Services reserves the right to close accounts and remove web pages and external links for persistent problems of inappropriate use; inaccurate or untimely information; privacy, security or performance reasons; violations of University policy; or illegal activities, in accordance with due process protocols and in consultation with University Counsel's Office, the Office of Labor Relations, and Institutional Advancement.

III.C. WEB DESIGN

To maintain a consistent image throughout the Downstate web site, every web page is required to adhere to the following design standards developed by the SUNY Downstate Web Site Development Committee:

1. Basic Web Page Format

World wide web pages must:

- Contain the official SUNY Downstate logo.
- List contact information for the individual maintaining the page, including his or her name and e-mail address, department name, and generic e-mail address.
- Conform to the approved Downstate template (please see the on-line [style guide](#) regarding parameters for flexibility of individual sites).

SUNY Downstate reserves the right to remove all pages and web sites that do not conform to the official design template.

2. Institutional Home Page

The institutional home page is an official publication of the State University of New York Downstate Medical Center.

- Content on the institutional home page is the responsibility of Institutional Advancement, acting on behalf of the President's Office, in consultation with the Chief Information Officer.
- Unless otherwise indicated, all materials appearing on the home page, including text and photographs, cannot be reproduced without written permission from SUNY Downstate.

3. Departmental and Program Home Pages

Home pages linked from SUNY Downstate may be created by academic, research, hospital, and administrative departments, programs, centers and institutes.

- Departmental Chairs are responsible for the accuracy of content contained on their pages.
- Department Chairs must designate a Primary Contact who will be responsible for creating and maintaining the department's home page. Information on how to reach this person must be supplied to the Web Master. The Primary Contact is responsible for periodically (at least annually) reviewing and updating the site's information
- All official documents must clearly list the sponsoring department, contact name, e-mail address, and date of last modification.
- Departmental pages must contain the SUNY Downstate logo in its original form.
- All subordinate official pages must contain a link back to the home page of SUNY Downstate.
- Unless otherwise indicated, all materials appearing on the home pages of departments, including text and photographs, cannot be reproduced without written permission from SUNY Downstate.

4. Faculty Pages

Faculty pages must be authorized by Department Chairs. Department Chairs are responsible for ensuring that authorized faculty pages are maintained, and that they adhere to SUNY

Downstate's web policies. Faculty pages must not contain links to or include an individual's personal web page or site without the prior approval from the Office of Institutional Advancement.

5. Student Organization Home Pages

Recognized student groups may create a student organization web page with the approval of the Director of the Student Center.

Student organization web pages must follow the information template approved by the Director of the Student Center. The information on these pages should include, at a minimum, the name of the student organization; its purpose (constitution and bylaws if available); and contact person, including his or her email address. Students may provide links to the home pages of national organizations or outside events relevant to the student organization, provided they first seek permission from the Director of the Student Center.

The Director of the Student Center is responsible for reviewing content and for ensuring that information on student organization home pages adheres to web policy.

Student organizations web pages must comply with the following regulations:

- Student organizations must be chartered and in good standing.
- Student organization web pages must be updated and current at the beginning of each academic year.
- Student organization web pages must not contain obscene, libelous, slanderous, or defamatory content.
- Student organization web pages must be in English.
- Student organization web pages must not be used by student organizations for commercial purposes and no commercial or business advertising can appear on any student organization web page(s).

III.D. LINKING POLICY

SUNY Downstate's website provides links to websites of various state, federal, and local government agencies and to websites of certain other organizations. SUNY Downstate does not provide links to private businesses unless a formal business partnership has been formed and/or the link is primarily educational in nature. In addition, SUNY Downstate does not link to any website that exhibits hate, bias or illegal discrimination.

The following guidelines are utilized in evaluating a website for linking from a SUNY Downstate webpage:

- Is the external website an official Federal or State supported website?
- Does the external website provide official government information or services?
- Does the external website complement existing information, products, or services on the SUNY Downstate website?
- Is the external website accessible and applicable to a wide audience?
- Is the external website's content relevant, useful, and authoritative?

- Does the external website’s information appear to be accurate and current?
- Is the external website’s approach to the privacy of personal information consistent with SUNY Downstate’s privacy and security policies?
- Is the external website “user-friendly?”

The SUNY Downstate Webmaster, in consultation with the Office of Institutional Advancement as necessary, will review links from the SUNY Downstate web pages on a routine basis to ensure that they operate effectively, add value to SUNY Downstate, and are consistent with SUNY Downstate’s mission.

SUNY Downstate will notify users when they are leaving its website, including a statement that such external sites do not necessarily operate under the same laws, regulations, or policies as SUNY Downstate, as follows:

Disclaimer:

The SUNY Downstate website includes links to information and sites created and maintained by other public or private organizations. SUNY Downstate provides these links solely for its users’ information and convenience. When users select a link to an external site, they are leaving the SUNY Downstate website and are subject to the privacy and security policies of the external sites. These sites do not necessarily operate under the same laws, regulations, or policies as SUNY Downstate.

SUNY Downstate does not control or guarantee the accuracy, relevance, timeliness, or completeness of information on a linked website. SUNY Downstate does not endorse the organizations sponsoring linked websites and does not endorse the views they express or the products and services they offer. SUNY Downstate cannot authorize the use of copyrighted materials contained in linked websites and is not responsible for transmissions users receive from linked websites.

III.E. DIGITAL MEDIA OR OTHER TYPES OF LARGE FILES AND THE INSTITUTIONAL WEB SERVERS

Downstate’s VM servers are designed to serve Web pages, and are not to be used as media servers for large media files or as download areas for large files of any type. Large digital media files (MP3 audio, any type of video file, or any individual file over 50MB in size) must not be placed without written authorization from the Downstate Webmaster. This is to insure the proper functioning of all Downstate web sites and to protect Downstate’s VM server from the extraordinary traffic volumes and storage requirements that digital media files sometimes impose. Please contact the Downstate Webmaster for further information or permissions.

III. F DISCLAIMERS

1. Official Downstate Information

SUNY Downstate’s various offices, projects, and programs are responsible for their own sections of this server. Contact e-mail address appears on each official Downstate web site. If any question arises about either the content or links appearing on this server, please contact the individual site administrator.

2. Abandoned or Unmaintained Web Sites

The Downstate Webmaster reserves the right to archive and remove sites on institutional Web servers that have not been edited or updated in over one year. Downstate reserves the right to archive and remove Web sites where the official Contact Person for the site cannot be contacted. The Webmaster will make reasonable efforts to contact the site owners in such cases.

3. Policy changes and policy enforcement

Downstate Web policy may change without notice. However, Information Services will always try to give Downstate publishers notice well in advance of any major changes in Web policies or procedures. Information Services reserves the right to make any technical changes on Downstate's institutional Web servers as necessary.

4. Links to other web sites

SUNY Downstate Health Sciences University's web site provides links to other web sites, both public and private, for informational purposes. SUNY Downstate makes no representations, guarantees, or warranties as to the accuracy, completeness, currency, or suitability of the information provided via links. SUNY Downstate specifically disclaims any and all liability and responsibility for any claims or damage that may arise as a result of SUNY Downstate providing the web site or the information it contains, or that may arise in any way with respect to any web sites maintained by third parties and linked to the SUNY Downstate site. SUNY Downstate makes no effort to independently verify, and does not exert editorial control over information on pages outside the domain downstate.edu. SUNY Downstate advises site visitors to read the privacy policies of any third-party policies of any third-party sites accessed through this site.

SUNY Downstate does not endorse any of the products, vendors, consultants, or documentation referenced in this web site. Any mention of vendors, products, or services is for informational purposes only.

IV Responsibilities

Information Services, Biomedical Communications, the Office of Institutional Advancement, and all employees of SUNY Downstate Health Sciences University are responsible for ensuring compliance with this policy.

V Reasons for Revision

Institutional changes.

VI Attachments

- Privacy Policy
- Email Policy
- Executive Order #1
- Ethics Commission Guidance Document
- Downstate Mission Statement
- Design style guidelines.
- FERPA Guidelines
- HIPAA Guidelines
- Student page template
- Editorial style guidelines.
- Photography guidelines for the web.
- HIPAA Compliant Media Authorization Form
- HIPAA Compliant Marketing Form

VII References
HIPAA Regulations.

	Revision	Required	Responsible Staff Name and Title
	Yes	No	
	Yes	No	
	Yes	No	
	Yes	No	