POLICY

UW Tacoma employees are expected to use approved cloud computing services in compliance with FERPA, HIPAA, PCI and other external agreements. If any UW Tacoma employee must store or share protected data using a 3rd party cloud service, Information Technology will review and select the most suitable method for installing, configuring, and training the employee on the use of an approved method to store or share data.

RULES

Faculty, staff, and students may not self-provision cloud services to store, process, share, or manage protected data, defined as regulated by information privacy or protection laws, regulations, contracts, binding agreements (such as non-disclosure), or industry requirements. If departments need to provision a cloud service to store, process, or share regulated institutional data, it must work with Information Technology in order to properly evaluate and manage the risks that come with using the service for regulated institutional data.

Data associated with cloud services are subject to the same policies that regulate all other types of electronic data at the UW Tacoma. As a result, contracts are in place with the vendors to address many important legal, regulatory, and compliance issues.

CLOUD BASED SURVEY TOOLS

BACKGROUND

Cloud based survey tools like Qualtrics, Google Forms, Microsoft Forms, and Surveymonkey have made it very easy for faculty, staff, and students to create, distribute, and analyze surveys. This also means that University data, often private or protected data, may be stored insecurely or owned by third parties.

GUIDANCE

The University of Washington has Business Associates Agreements (BAA) in place with Microsoft Forms and REDCap. REDCap BAA agreements are managed by UW Medicine IT Services. If required, the University could enter into a BAA with a preferred vendor if there is sufficient demand.

SurveyGizmo and Surveymonkey are neither HIPAA nor FERPA compliant using the consumer licensed version. Surveys should be designed to ensure that any HIPAA, FERPA or protected data is not gathered during the survey process. Most surveys do not require strict security as the data does not contain personal information.

If departments need to use a cloud based survey tool and are unsure of the data security or privacy risks, Information Technology will review the requirements to help select an appropriate tool.

SURVEYING TOOLS MATRIX

	UW Google Forms	UW Microsoft Forms	Qualtrics	REDCap	SurveyGizmo & Surveymonkey
Cloud-based	Yes	Yes	Yes	n/a	Yes
Data Security	HIPAA **Non-Compliant;** FERPA Compliant	HIPAA* & FERPA Compliant	HIPAA **Non-Compliant**; FERPA Compliant	HIPAA Compliant**; FERPA **Non-Compliant**	HIPAA & FERPA **Non-Compliant**
Off Campus Availability	Yes	Yes	Yes	Yes	Yes
Self Service Access Control	Yes	Yes	Yes	Yes	Yes
Eligibility	Faculty, Staff, Students, Researchers, Clinicians. Google Products do not support Shared NetIDs.	Faculty, Staff, Students, Researchers, Clinicians. Accounts for shared and sponsored NetIDs available upon request.	Faculty, Staff, Students, Researchers, Clinicians.	Faculty, Staff, Students, Researchers, Clinicians. Accounts for shared and sponsored NetIDs available upon request.	Not applicable. Not a UW supported tool

* If HIPAA compliance is required, please contact Information Technology for proper configuration.

** BAA agreement is managed by UW Medicine IT Services and is under review by UW CISO and PRIVACY Team

CLOUD BASED STORAGE

Revised: 3/3/2022

BACKGROUND

File hosting and collaboration services like OneDrive, Google Drive, and other cloud services are convenient tools for storing and synchronizing files on one or more computers. When collaboration is needed, these services can also be very useful for sharing files across and between organizations.

GUIDANCE

File hosting and collaboration services should be selected based on user requirements. This includes, but is not limited to, storage capacity and whether HIPAA and FERPA compliancy is needed. The File Sharing Services Matrix below shows the services available and the features they include. In many cases, the departmental shared drive (S: on local server) may be the best solution.

UW OneDrive for Business

UW Tacoma has a subscription to UW OneDrive for Business, a Microsoft service used for file storage and sharing with other UW users. It is designed for enterprise customers and a Business Associates Agreement (BAA) is in place, meeting UW Tacoma's security requirements for HIPAA, FERPA and protected data. UW OneDrive for Business is not the same as the OneDrive service offered by Microsoft to individual users. All current UW students, faculty, and staff are automatically eligible to use UW OneDrive for Business.

UW Google Drive & Team Drive

Google Team Drive is a great collaboration space for those who utilize UW Google Drive. Team drives are owned by the Team and not an individual. So when creating a UW Google Team Drive, users must make sure at least one UW account is associated to the drive at all times. If all the UW accounts withdraw from the particular Team Drive, the last UW person should close the Team drive, discontinue all the external Team Drive members, and/ or transfer the content to another Google Team Drive (perhaps owned by another university). Otherwise a UW Team Drive could end up with only external members with no UW connection. NOTE: Recent and ongoing changes to the UW Google platform may limit the services available to UW members. For more information, please visit the UW Google Changes Project.

We do not recommend consumer versions of Microsoft OneDrive and Google Drive for storing any university business, research and/or student data. Using consumer versions of cloud services is NOT the same as using the UW branded, sanctioned services - even from the same provider.

Additional solutions including Amazon Web Services (AWS), Microsoft Azure, UW Google Apps and Canvas may be available on a case-by-case basis depending on the data classification and access requirements. For more information, please contact Information Technology.

Revised: 3/3/2022

FILE SHARING SERVICES MATRIX

For additional file sharing and collaboration tools, visit: https://www.tacoma.uw.edu/it/file-storage-services
NOTE: Recent and ongoing changes to the UW Google platform may limit the services available to UW members. For more information, please visit the UW Google Changes Project.

	Amazon Web Services (UW sponsored)	Canvas LMS	UW Google Drive & Team Drive	Open Science Framework (OSF)	UW Onedrive for Business	UW Tacoma Home (H) and Shared (S) Drives
Synchronous Editing	n/a	n/a	Yes	n/a	Yes in Word, Excel, & PowerPoint Web Apps.	n/a
Cloud-based	Yes	n/a	Yes	Yes	Yes	n/a
Data Security	HIPAA* & FERPA Compliant with configuration	HIPAA **Non-Compliant**; FERPA Compliant	HIPAA **Non-Compliant**; FERPA Compliant	HIPAA* & FERPA **Non-Compliant**	HIPAA* & FERPA Compliant	HIPAA* & FERPA Compliant
Storage	Unlimited (w/ costs)	1 GB	100 GB	Unlimited	5 TB	H: drive: 25 GB** S: drive: 200 GB per department***
Off Campus Availability	Yes	Yes	Yes	Yes	Yes	Via RFA or Remote Desktop
Self Service Access Control	Yes	Yes	Yes	Yes	Yes	n/a
Eligibility	Faculty, Staff, Researchers, Clinicians	Faculty and the students taking their classes. Staff can request a course site as well	Faculty, Staff, Students, Researchers, Clinicians	Faculty, Staff, Researchers, Clinicians, UW affiliates	Faculty, Staff, Students, Researchers, Clinicians. Accounts for shared and sponsored NetIDs available upon request	Faculty, Staff, Students, Researchers, Clinicians

* If HIPAA compliance is required, please contact Information Technology to set up your network storage.
** Upon approval, UW Tacoma IT can increase the individual H: drive storage.
*** Storage on S: is shared by entire department or College. Users need to gauge existing use of storage by their own department to determine available capacity.

ADDITIONAL INFORMATION

For more information, please also refer to the following:

UW Electronic Information Privacy Policy on Personally Identifiable Information
https://www.washington.edu/admin/rules/policies/APS/02.02.htmlhttps://www.tacoma.uw.edu/it/file-storage-services
UW Confidential Data Risk Guide
https://itconnect.uw.edu/security/security-and-privacy-policies/