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**Status** Final

**Policy Type** [University](#)

**Contact Office**

[University Communications](#)

**Oversight Executive**

[President of the University](#)

**Applies To**

Academic Division

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**Reason for Policy**

Digital communications are a powerful and efficient tool to communicate with University constituents to conduct the business of the institution and foster engagement at UVA. A unified digital communications policy is necessary to establish clear responsibility and standards for how University entities connect with constituents via mass email and other digital communications tools.

**Definition of Terms**

**Constituents**

Members of the University community who have a record(s) in any of the University's official databases, such as Advance, SIS, and Workday. These individuals include students, faculty, staff, retirees, parents, donors, and alumni, as well as Health System employees, staff and faculty at the College at Wise, and employees at foundations or other University-related organizations. External constituents who do not have a record in an official database may also be constituents through other relationships, for example by providing their email addresses when subscribing to listservs or purchasing tickets to athletic or cultural events.

**Digital Communications Tools**

Methods of digitally communicating to constituents including, but not limited to:

- Email
- Text
- Social Media (Facebook, Twitter, Instagram, Snapchat)
- Websites
- Digital Advertising Channels
- Marketing Automation Platforms
- Social Listening Tools

## Mass Digital Communication

A digital communication to 500 or more constituents, whether in total or segmented at the individual level or in small groups, and regardless of whether from a single sender or grouped senders, that use data from a University database and a digital communications tool.

### Policy Statement

All faculty, staff, and students using digital communications tools and constituent data to connect with groups of 500 or more constituents, whether at once or in segments, must adhere to the following provisions.

**1. Mass Digital Communications Must Be Mission-related:**

Mass digital communications that utilize constituent data or are sent by University email accounts must be related to the University's mission of teaching, research, public service, and health care.

**2. Communications Must be Relevant:**

Mass digital communications must be relevant to the recipients. Relevancy is defined as related to an existing transaction or relationship, including, but not limited to:

- Applying to and/or attending (with or without graduating from) the University.
- Working at the University or its associated organizations.
- Giving to the University.
- Indicating interest in the University by subscribing to listservs, social groups, or through ticket purchases.

**3. Mass Digital Communications to Certain Constituent Groups Require Pre-Approval:**

Mass digital communications to certain audiences must have executive-level approval in advance of issuance. The following matrix delineates the approval authorities for various types of mass digital communications.

Communication Type	Recipients	Approval Authority (or designee)
Emergency Notifications	Any	President; Vice President for Communications & Chief Marketing Officer
University-wide Major Announcements	Any audiences combined, or any subset of audiences	President; Vice President for Communications & Chief Marketing Officer

Academic Matter	Faculty, staff, students, or alumni, or any combination thereof	Executive Vice President and Provost (EVPP)
Operational Matter	Faculty, staff, students, or alumni, or any combination thereof	Executive Vice President and Chief Operating Officer (EVPCOO)
Matter that is neither exempted from pre-approval nor Emergency Notification	Medical Center	Executive Vice President for Health Affairs
Matter that is neither exempted from pre-approval nor Emergency Notification	Wise	Chancellor at Wise
Student Life Matter	Students, parents, or alumni, or any combination thereof	VP Student Affairs
Advancement Matter or Solicitation	Audiences that include students, parents, faculty, and/or staff	Vice President for Advancement with review by EVPP, EVPCOO, and/or Student Affairs as appropriate (students and parents)
Advancement Matter or Solicitation	Audiences that include donors and/or external constituents, including parents and/or alumni	Vice President for Advancement, with review by Student Affairs as appropriate (parents)
Advancement Matter or Solicitation	Audiences affiliated with single school	Dean of that school, with review by the Vice President for Advancement as appropriate
Academic or Operational Matter	Faculty, staff, students, or alumni, or any combination thereof in a single school	Dean of that school
Surveys	Any audiences combined or any subset of audiences	Applicable oversight office, with review by EOCR and IRA as appropriate

***With the exception of the President, executive-level staff will provide notice to their counterparts in other relevant units regarding any mass digital communication to constituents in those units.***

#### **4. Exceptions to Pre-Approval:**

On-going pre-approval from the appropriate executive may be given for certain types of repetitive communications. Exceptions to pre-approval include:

- Newsletters or listservs to which recipients have subscribed.
- Annual notices required by law (see [Related Information](#) for examples).
- Annual transactional emails that are deemed part of normal business practice and for which timely communication is crucial to sustained operations (see [Related Information](#) for examples).
- Notices to employees with certain responsibilities that cross organizations (for example, informing employees engaged in research that federal disclosure requirements have changed).
- Communication with giving societies, including donor recognition and stewardship groups.

**5. Advancement-only Exceptions to Pre-Approval:**

The cultivation, engagement, solicitation, and stewardship of donors or Advancement prospective donors to the University represent distinct but vital functions that rely heavily on building and maintaining relationships. Communication is essential to this process. Advancement messaging is commercial communication, giving the recipient the ability to unsubscribe in accordance with the requirements of the [CAN-SPAM Act](#), except in cases of communications concerning gift receipting.

**6. Survey Administration:**

The distribution of surveys to faculty, staff, and/or students, or any combination thereof, as a mass digital communication, must be approved by the appropriate EVP(s) and/or VP(s). There is no exception from the pre-approval requirement for survey distribution. Notification must be given to Institutional Research and Analytics. The administration of such surveys is outside the purview of this policy and additional approvals may be required. Questionnaires, polling, and surveys distributed by an Executive Vice President, Vice President, or Dean only to their respective unit for logistical or planning purposes (i.e., scheduling a meeting or asking constituents in their unit to provide feedback on a given process) are not bound by the provisions of this section.

**7. Systems Access:**

Users must have the appropriate system access as designated by the appropriate executive in order to access relevant University data or distribute a mass digital communication.

**8. Emergency Communications:**

In order to safeguard the relevant and correct flow of information during an emergency or time of crisis, the President of the University or his designee may temporarily suspend prior approvals for mass digital communications and access to digital communications tools in order to enable emergency communications.

**9. Compliance with Policy:**

University staff charged with mass digital communications as part of their duties and thereby designated by the President, EVP&COO, EVP&P, VP for Advancement, or VP & Chief Student Affairs Officer, must monitor and may request data analytics for digital communications campaigns utilizing University-owned data to confirm compliance with this policy.

Failure to comply with this policy may result in reduced access to digital communications tools and/or restricted sending capabilities; fines and/or prosecution under applicable state and federal laws; loss of access to University-owned resources; and/or disciplinary action up to and including termination.

Questions about this policy should be directed to [University Communications](#).

## **Procedures**

### *Internal Audiences:*

To request distribution of mass digital communications to faculty, staff, and/or students, see [Mailing Lists](#) to submit a Distribution Request Form for review by the appropriate executive office(s) based on the intended audience and content of the message.

### *External Audiences:*

Beyond receiving pre-approval to message certain constituents named above, mass digital communications are typically handled within the sender's own area.

### **Related Information**

[IRM-002: Acceptable Use of the University's Information Technology Resources](#)

[IRM-003: Data Protection of University Information](#)

[IRM-004: Information Security of University Technology Resources](#)

[IRM-008: University Information Technology Accessibility](#)

[IRM-012: Privacy and Confidentiality of University Information](#)

[STU-002: Rights of Students at the University of Virginia Pursuant to the Family Educational Rights and Privacy Act \(FERPA\)](#)

[Notice of Non-Discrimination and Equal Opportunity](#)

[University Security Awareness \(Responsible Computing\) – Faculty & Staff](#)

[University Code of Ethics and Mission Statement](#)

Medical Center Policy [0193: Electronic Mail \(E-mail\)](#)

Health System Policy [IT-002: Electronic Information and Systems Use](#)

[Commonwealth of Virginia Code Section 18.2-152.3:1 Transmission of unsolicited bulk electronic mail \(spam\); penalty](#)

[CAN-SPAM Act](#)

### Examples of Mass Digital Communications Required by Law:

- Disability/Veteran Status
- FERPA Rights for Students
- Free Speech
- Consumer Information - Students
- Clery
- Alcohol and Other Drugs
- Export Controls

### Examples of Mass Digital Communications Relevant to Ongoing University Processes:

- Benefits Open Enrollment
- Conflict of Interests
- Consumer Information - Employees
- Earthquake Drill
- Emergency System Test
- FERPA Training - Employees
- NSF Requirements
- Reporting/Non-Discrimination
- Safety Preparedness
- Title IX
- UVA Saves Hour
- VITA tax assistance
- Voting

**Major Category** [Information Resource Management](#)

**Next Scheduled Review** Saturday, April 8, 2023

**Applies To Text**

Academic Division.

**Supersedes Policy Text**

IRM-006: Mass Electronic Mailings; IRM-007: Electronic Mailings for Advancement Activities.

**Last modified** March 5, 2024 - 10:16am

**Approved By** Executive Vice President & Chief Operating Officer

**Approved Date** March 11, 2020 - 12:00pm