

# Privacy Policy for Commute Trip Reduction Electronic Surveying

## **Definitions**

CTR – Commute Trip Reduction

ETC – Employee Transportation Coordinator

PDR – Public Disclosure Request

RCW – Revised Code of Washington

SESRC – Washington State University’s Social & Economic Sciences Research Center

WSDOT – Washington State Department of Transportation

## **Policy**

### *Anonymity*

WSDOT is committed to maintaining the anonymity of every individual who takes the CTR survey.

While, as a public agency, WSDOT is required by [RCW 42.56](#) to provide certain information in response to PDRs, the information provided under such a request will not include the identities of individual survey respondents. The electronic survey system does not allow for users to view or export data in a way that connects personally identifying information with a respondent's survey answers.

### *Email Addresses*

Email addresses are used solely for the purpose of enabling worksites and their employees to use the electronic survey. Email addresses are considered confidential, and WSDOT will not provide them as part of a PDR or any other request (see [FAQ](#) section below for additional details). Once WSDOT has processed the survey results at the end of each two-year survey cycle, all surveys and associated email addresses are purged

### *Background*

This privacy policy is specific to the electronic CTR Survey Tool accessed at [www.CTRSurvey.org](http://www.CTRSurvey.org).

This tool is administered by WSDOT, and operated under contract by the SESRC.

## **FAQs**

### *Why are email addresses required?*

Email addresses are utilized in the survey process in two ways.

- 1) A worksite may choose to conduct its survey using a specific list of employee email addresses uploaded to the electronic system; this allows only respondents entering one of the listed addresses to access the survey. Companies must use this method in the following two situations:
  - a. When multiple worksites for a single company will survey at the same time. The email address list verifies an employee's survey is assigned to the correct worksite.
  - b. When a worksite utilizing sampling (i.e., only surveys a portion of its employees). This ensures that only the selected employees are granted access.
- 2) A worksite may alternatively choose to conduct surveys by one or more company domains (e.g., @acme.com, @abccompany.net); respondents gain access by entering any email address associated with that domain. The email addresses of accessed surveys are recorded in order to keep the same person from accidentally surveying more than once and to allow the user to return to a partially completed survey.

*How does it work for a survey respondent?*

When an employee accesses the CTR survey s/he will initially be asked for his/her email address. This will be checked against a list of known email addresses or domains for currently open surveys.

*Who can access the list of email addresses?*

Only the restricted WSDOT staff and the worksite's ETC(s) have access to view and export the email list. The email list is considered confidential and will never be provided to an outside requestor. A login and password are required to gain entry into the surveying application where the email addresses are stored. Permissions for jurisdictions and ETCs are limited to only their assigned worksites.

*What is done with the email address list?*

Email address lists are only retained for the length of the survey cycle and thereafter purged. This is in compliance with [Executive Order 00-03](#) on *Public Records Privacy Protection*: "Agencies shall examine their record retention schedules and retain personal information only as long as needed to carry out the purpose for which it was originally collected, or the minimum period required by law." Emails and associated information fall within a category of records that are to be retained only until no longer needed for agency business.

*What are the time periods for a surveying cycle?*

Survey cycles run for two-year periods, starting on January 1st of odd-numbered years and ending on December 31st of even-numbered years (e.g., January 1, 2015, to December 31, 2016).

*Why are the email addresses not purged immediately?*

Electronic survey results are stored in the CTR Survey Tool. After a survey is closed, the results are exported in a data file (important note: this file does **not** contain email addresses). That file is processed by the WSDOT CTR Application and used to create aggregated information for each worksite. When a survey is purged from the CTR Survey Tool, the data file can no longer be exported. WSDOT's standard procedure is to keep all surveys for the current cycle intact to preserve the ability to re-export a data file, to update or edit the survey parameters, or to answer questions (e.g., worksites occasionally offer incentives for taking the survey and request a list of email addresses so it can be used to select a recipient). After a survey cycle is completed and all data are verified to be accurate, the surveys, and corresponding email address lists, are purged.

*Can the email list be purged sooner?*

Yes. While the standard procedure is to only purge the survey responses after the completion of each survey cycle, WSDOT will purge the survey sooner by request. Please contact us at [CTRSurvey@wsdot.wa.gov](mailto:CTRSurvey@wsdot.wa.gov) for more information.

*Are survey results anonymous?*

Yes. Even though an email is required to access the survey, no emails are recorded with the survey responses. Each person's response remains completely anonymous. While WSDOT is obligated to provide the resulting files when requested, the files do not contain any personally identifiable information.

*Why is WSDOT not required to divulge email addresses as part of a PDR?*

RCW 42.56.070 (9) does not authorize “any agency...to give, sell or provide access to lists of individuals requested for commercial purposes, and agencies...shall not do so unless specifically authorized or directed by law.” Furthermore, WSDOT’s *940.00 Data Security* policy defines “confidential information” as “Information including, but not limited to: Names, Addresses, Social Security Numbers, and E-mail address...” Finally, RCW 42.56.330 (3) states, “The following information relating to public utilities and transportation is exempt from disclosure under this chapter...[including] the names, residential addresses, residential telephone numbers, and other individually identifiable records held by an agency in relation to a vanpool, carpool, or other ride-sharing program or service.”

*Is it possible to survey without email addresses at all?*

Yes, there are two different methods, but both options add a considerable amount of effort for the worksite surveying.

**Option 1:**

A worksite may assign a code to each person (e.g., 1, 2, 3 ... 998, 999), and that person would be required to access the system by using that assigned number or other code, instead of his or her actual email address. For example, if Bob Smith is assigned a 1, and Heidi Smith is assigned a 2, they could access the survey as 1@company.com and 2@company.com, respectively, rather than bob.smith@company.com and heidi.smith@company.com. When surveying by domain, the system only checks for unique mailboxes (i.e., the part before the @ sign in the email address).

Note: This method introduces an increased chance for issues if people enter their coded emails incorrectly. In such cases, WSDOT will be of limited help, as we do not have any information besides the coded email addresses used to access the survey.

**Option 2:**

The company may survey by paper. Rather than accessing an electronic version of the survey, an ETC can distribute paper copies of the survey to the worksite’s employees. The employees complete and return the survey. No email address is required, and the paper surveys do not ask for any other identifying information.

Note: This option is not available to worksites that are using sampling.

*What happens to the data collected?*

CTR survey results are aggregated at the worksite level and used to analyze performance at the jurisdiction, county, and statewide levels. The results are shared with the respective companies, jurisdictions, state administrators, and the legislature, and ultimately help shape transportation policy and strategy.

*What if I still have a question?*

Contact WSDOT’s CTR team by email at [CTRsurvey@wsdot.wa.gov](mailto:CTRsurvey@wsdot.wa.gov) or by phone at 206-464-1215 (Michael Wandler).

For further information on Commute Trip Reduction and privacy-related RCW's and policies and other information, please review the following:

- [RCW 42.56.330](#) – Statute addressing transportation related data that is exempt from PDRs.
- [RCW 47.04.240](#) – Statute addressing the use of transportation-related data.
- [Executive Order 00-03](#) – Governor's directive to state agencies regarding protection of personal privacy rights of Washington's citizens: lists of exempted information from PDRs and other information related to the use and sharing of data.
- 940.00 Data Security – Internal WSDOT policy related to confidentiality of data resources containing personally identifiable information.