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Data Privacy Policies

1. **Privacy and Security Policies and Procedures**
 1. APS-6005 <https://www.cu.edu/ope/aps/6005>
 2. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
2. **Identification of a Privacy and Security Board and Officer** Server/OIT
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
3. **Management Oversight of Privacy and Security Programs** Server/OIT
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
4. **Sanctions for Violations of Policies and Procedures** User/SEHD Server/OIT
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
 2. APS-6005 <https://www.cu.edu/ope/aps/6005>
5. **Reporting Potential Problems in Privacy and Security** User/SEHD Server/OIT
 1. APS-6005 <https://www.cu.edu/ope/aps/6005>
 2. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
6. **Incident Response and Incident Response Mitigation** User/SEHD Server/OIT-same as #5
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
 2. See attached Incident Response Process Flow Diagram for unit/department responsibility.
7. **Privacy and Security Training** User/SEHD
8. **Access Control, Minimum Necessary Access and Verification for Access to Data** User/SEHD Database Server/OIT
 1. APS-6005 <https://www.cu.edu/ope/aps/6005>
 2. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
 3. APS-6001 <https://www.cu.edu/ope/aps/6001>
9. **Password Management** User/SEHD Database Server/OIT - complying with university policy
 1. University Password Policy http://www.ucdenver.edu/faculty_staff/employees/policies/Policies%20Library/Admin/fp5-13.pdf
10. **Transmitting Sensitive Information Securely including Faxing and Email** User/SEHD—duplicative with #1
 1. Email and Webmail Stay Secure <https://www1.ucdenver.edu/offices/office-of-information-technology/software/how-do-i-use/email-and-webmail>
 2. HIPAA Policy 7.1 Safeguards https://www1.ucdenver.edu/docs/default-source/offices-oit-documents/it-related-policies/hipaa-7-1-safeguards.pdf?sfvrsn=48bb7b8_6
11. **Log-in Monitoring** Database Server/OIT
 1. Needs to be implemented and documented
 2. OIT has an internal standard for logging, monitoring and auditing that applies to all servers managed by CU Denver OIT.
 3. HIPAA Policy 9.3 Auditing <http://www.ucdenver.edu/research/Research%20Administration%20Documents/9.3%20Auditing.pdf>
12. **Workstation Security Configuration** User/SEHD, Server/OIT - duplicative with #1
 1. APS-6005 <https://www.cu.edu/ope/aps/6005>
 2. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
13. **Device and Media Control** Database Server/OIT - duplicative with #1
 1. APS-6005 <https://www.cu.edu/ope/aps/6005>
 2. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
14. **Securing Materials with Data** User/SEHD-duplicative with #1

1. Security and Compliance Hard Drive Disposal
https://www1.ucdenver.edu/docs/default-source/offices-oit-documents/it-related-policies/hipaa-7-1-safeguards.pdf?sfvrsn=48bb7b8_6
15. Encryption Database Server/OIT
 1. Encrypt Your Laptop Guidance
<https://www1.ucdenver.edu/offices/office-of-information-technology/software/secure-campus/encryption>
 2. Guide to Secure Devices
<https://www1.ucdenver.edu/offices/office-of-information-technology/software/secure-campus/guide-to-secure-devices>
 3. APS-6005 <https://www.cu.edu/ope/aps/6005>
 4. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
16. Authorizations for Personal Health Information, if applicable User/SEHD -NA
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
17. Permitted Uses and Disclosures of PHI, if applicable User/SEHD—NA
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
18. HIPAA Status, if applicable Server/OIT
 1. UC Denver’s File servers are HIPAA compliant.
 2. Units/Departments can request assistance from the RAC team on the security of data usage.
<https://www1.ucdenver.edu/offices/office-of-information-technology/services/security-and-compliance>
19. Business Associate Status, if applicable
 1. NA
20. Designating Sensitive Information User/SEHD – may be duplicative
 1. University Data Classifications and Impact
<https://www.cu.edu/ois/data-classifications-impact>
21. Risk Assessments and Management User/SEHD – duplicative
 1. University HIPAA Policy <http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx>
22. Change Control Procedures User/SEHD – user access/retiring users
 1. OIT is also working on a process flow diagram to guide units/departments on their role in this process and how the OIT CAB process fits into the process.
23. Audit and Evaluation Procedures User/SEHD Server/OIT – designated liaison and form for auditors
 1. Units/Departments can request assistance from the RAC team on the security of data usage, but we are not auditors, nor do we have a specific form.

Sample Local Education Agency Policy Links:

<http://www.cde.state.co.us/dataprivacyandsecurity/sampleitpolicies>

From:
<https://wiki.cu.studio/> - **SEHD Wiki**

Permanent link:
https://wiki.cu.studio/minimum_required_data_policy?rev=1553713150

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