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## **Data Privacy Policies**

- 1. Privacy and Security Policies and Procedures
- 2. Identification of a Privacy and Security Board and Officer
- 3. Management Oversight of Privacy and Security Programs
- 4. Sanctions for Violations of Policies and Procedures
- 5. Reporting Potential Problems in Privacy and Security
- 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
- 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
  - University Password Policy http://www.ucdenver.edu/faculty\_staff/employees/policies/Policies%20Library/Admin/fp5-1 3.pdf
- Transmitting Sensitive Information Securely including Faxing and Email User/SEHD—duplicative with #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.
  - HIPAA Policy 9.3 Auditing http://www.ucdenver.edu/research/Research%20Administration%20Documents/9.3%20Au diting.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
  - University HIPAA Policy http://www.ucdenver.edu/research/ORC/HIPAA/Pages/Policy.aspx
- 14. Securing Materials with Data User/SEHD-duplicative with #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
  - Encrypt Your Laptop Guidance https://www1.ucdenver.edu/offices/office-of-information-technology/software/secure-campus/encryption

- 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

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Permanent link:

https://wiki.cu.studio/policy/data\_privacy?rev=1553795252

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