



**Campus Administrative Policy**

**Policy Title: Personally Identifiable Information – Open Records Act**

Policy Number: 3057                      Functional Area: **General Administration**

---

Effective: February 13, 2007  
Date Last Amended/Reviewed: February 13, 2007  
Date Scheduled for Review: July 1, 2014  
Supersedes: N/A

Approved by: Chancellors

Prepared by: University Counsel  
Reviewing Office: President’s Office  
Responsible Officer: University Counsel

Applies to: University of Colorado Denver  
University of Colorado Anschutz Medical Campus

---

**A. INTRODUCTION**

The purpose of this policy is to set forth the University of Colorado Denver and University of Colorado Anschutz Medical Campus policy on the collection, storage, transfer and use of personally identifiable information, as required by the Colorado Public (Open) Records Act, section 24-72-501 et seq., Colorado Revised Statutes.

**B. DEFINITIONS**

For purposes of this policy, and except as set forth below, “personally identifiable information” includes information about an individual collected by the University that could reasonably be used to identify such individual, regardless of the source of such information or the medium in which it is recorded. Personally identifiable information includes but is not limited to first and last name, residence or other physical address, electronic mail address, telephone number, birth date, credit card information and social security number.

For purposes of this policy, “personally identifiable information” does not include information collected in furtherance of any regulatory, investigative, or criminal justice purpose, information collected in furtherance of litigation in which the University is a party, or information that is required to be collected pursuant to any state or federal

statute.

## **C. POLICY STATEMENT**

The University supports the protection of individual privacy. It recognizes the numerous and complex laws that govern the collection, storage, transfer, use and access to personally identifiable information. It also recognizes that individual privacy rights vary substantially based on the applicable factual and legal circumstances.

The University shall comply with all applicable laws that govern the collection, storage, transfer, use and access to personally identifiable information, including but not limited to Part 2 of the Colorado Open Records Act, 24-72-201 et seq., Colorado Revised Statutes and Part 5 of the Colorado Open Records Act, 24-72-501 et seq., Colorado Revised Statutes.

The University shall strive to minimize the collection of personally identifiable information, regardless of its source or medium to the least amount of information required to complete a particular transaction or to fulfill a particular purpose. University administrators, faculty and staff, agents and other representatives should limit any request for personally identifiable information to the minimum necessary or appropriate to accomplish the purpose for which it is requested.

Consistent with applicable law and University policy, custodians of personally identifiable information shall take reasonable and appropriate steps to (a) limit access to and further use or transfer of such information, and (b) ensure that the information is maintained in a form and manner that is appropriately secure in light of the nature and sensitivity of the information.

Each campus shall identify one or more persons who will be available to receive questions and feedback about the University's compliance with this policy. Each campus is authorized to issue its own policies and procedures to carry out this policy.

A copy of this policy shall be published on the University's website, as required by section 24-72-502(2)(a), Colorado Revised Statutes.

### **Notes**

1. Dates of official enactment and amendments:  
February 13, 2007: Adopted by CU Denver Chancellors  
May 22, 2019: Modified
2. History:  
May 22, 2019: Modified to reflect a Campus-wide effort to recast and revitalize Campus policy sites into a standardized and more coherent set of chaptered policy statement organized around the several operational divisions of the university. Article links, University branding, and formatting updated by the Provost's office.

3. Initial Policy Effective Date: February 13, 2007
4. Cross References/Appendix:
  - Part 2 Colorado Open Records Act, 24-72-201 et seq.
  - Colorado Revised Statutes
  - Part 5 of the Colorado Open Records Act, 24-72-501 et seq.
  - Colorado Revised Statutes.