

University of Colorado School of Medicine

Graduate Medical Education

Policy: HIPAA Compliance Procedure		
Original Approval: November 19, 2003	Effective Date:	Revision Date: July 1, 2009 July 25, 2019 (editorial)

In this document, “Resident” refers to both specialty Residents and subspecialty Fellows.

All University of Colorado School of Medicine GMEC-approved programs will adhere to requirements addressed under HIPAA regulations and the University of Colorado Denver (UCD) policies. Compliance with HIPAA Privacy and Security Rule requirements will be met by successful completion of the HIPAA Regulations online module.

Allegations against a resident addressing violation of HIPAA regulations or UCD policies will be referred to the UCD Office of Regulatory Compliance for investigation who will then contact the Associate Dean for GME. If the allegations involve reference to a CU GME affiliated hospital, the Associate Dean for GME will inform the hospital’s GME liaison of the allegations.

A substantiated first violation, as determined by the UCD Office of Regulatory Compliance, will result in a resident being required to complete and document a program of remediation to be determined by Program Director, with concurrence from the UCD Office of Regulatory Compliance.

A second substantiated violation, as determined by the UCD Office of Regulatory Compliance, may be grounds for dismissal from a GMEC-approved training program or subject the offender to other sanctions, including formal Probation, as determined by the Program Director and Associate Dean for GME in consultation with the UCD Office of Regulatory Compliance and the UC Denver University Counsel Office.