

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: Human Resources

BCOM Policy 4306

TOPIC: Personnel/Student Personal Information Records
Including Medical Records

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Approved: Signature on File

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*Policy reformatted and renumbered for uniformity May 2016

The BCOM philosophy is to safeguard personal employee/student information (to include medical records) in its possession to ensure the confidentiality of the information. Additionally, BCOM will only collect personal information that is required to pursue its business operations and to comply with government reporting and disclosure requirements. Personal information collected by BCOM may include: employee/student names, addresses, telephone numbers, e-mail addresses, emergency contact information, EEO data, social security numbers, date of birth, employment eligibility data, benefits plan enrollment information, which may include dependent personal information, and school/college or certification credentials. All information collected, is maintained in a locked, segregated area with limited access to only those deemed necessary.

Personal information will be considered confidential and as such will be shared only as required and with those who have a need to access such information. All hard copy records will be maintained in locked, secure areas with limited access. Personal information used in business system applications will be safeguarded under company proprietary electronic transmission and intranet policies and security systems. Participants in company benefit plans should be aware that personal information will be shared with plan providers as required for their claims handling or record keeping needs.

Company-assigned information, which may include organizational charts, department titles and staff charts, job titles, department budgets, company coding and recording systems, telephone directories, e-mail lists, company facility or location information and addresses, is considered by the company to be proprietary company information. The company maintains the right to communicate and distribute such company information as it deems necessary to conduct business operations. Employees/students have the option to elect to have certain personal information not published.

If an employee/student becomes aware of a material breach in maintaining the confidentiality of his or her personal information, the employee/student should report the incident to the Office of the Facilities and Compliance Coordinator. Please be aware that a standard of reasonableness will apply in these circumstances.

Examples of the release of personal employee information that will not be considered a breach include the following:

- Release of partial employee birth dates, i.e., day and month is not considered confidential and will be shared with department heads who elect to recognize employees on such dates.
- Personal telephone numbers or e-mail addresses may be distributed to department head in order to facilitate company work schedules or business operations.
- Employee identifier information used in salary or budget planning, review processes and for timekeeping purposes will be shared with department heads.
- Employee's company anniversary or service recognition information will be distributed to appropriate department heads periodically.
- Employee and dependent information may be distributed in accordance with open enrollment processes for periodic benefit plan changes or periodic benefits statement updates.

Examples of the release of student personal information that will not be considered a breach include the following:

- Burrell College of Osteopathic Medicine may disclose, without consent, “directory” information. The College has declared the following information to be “directory”: student’s name, address, telephone number, date and place of birth, major field of study, dates of attendance, degrees and awards received, photographs, educational institutions attended, enrollment status, and e-mail address. Students have the right to request that the school refrain from disclosing some or all directory information. This will prevent BCOM however, from printing your name in certain publications (i.e. commencement program) or disclosing directory information requested by third parties including spouses and parents. A student can complete a “Request to Prevent Disclosure of Directory Information” form and submit to the Registrar’s office.

BCOM may also disclose education record without a student’s prior written consent to:

- Officials of another institution to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student; or enforce the terms and conditions of the aid (§99.31(a)(4));
- Organizations conducting certain studies for or on behalf of the school;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; under conditions described in 34 CFR §99.36 and §99.31(a)(10)
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of §99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding (§99.31(a)(13));
- To the general public, the final results of a disciplinary proceeding, subject to the requirements of §99.39, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school’s rules or policies with respect to the allegation made against him or her (§99.31(a)(14))

BCOM maintains strict confidentiality of employee/student records. However, operating requirements of the company or federal or state laws or regulations may necessitate disclosure of certain information. The purpose of the section below is to outline some of the circumstances in which employee information will be disclosed to external organizations.

Garnishments/Levies/Support Orders

Upon receipt of a properly authorized request to release information or initiate deductions from employee pay, the company will release salary or wage information and begin deductions from pay.

Lenders/Credit Organizations

Upon receipt of an authorized request that includes the employee’s/student’s signature, the company will release information to lenders or credit organizations. The company will not respond to any telephone requests for such information.

Prospective Employers

The company will provide the following information on request to prospective employers for reference purposes: job title (s) held, dates of employment, earnings at termination (with signed authorization to release information).