

BURRELL COLLEGE OF OSTEOPATHIC MEDICINE

STANDARD OPERATING PROCEDURES

Personnel File Process		SOP #: HR.017.02
Effective Date	11/29/2016	
Last Revision/Review	12/01/21	

1. Purpose

Burrell College of Osteopathy Medicine (Burrell) philosophy is to safeguard personal employee information (to include medical records) in its possession to ensure the confidentiality of the information. Personal information collected by Burrell 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.

2. Related Policy/Authority

Burrell Policy B2090/BCOM Employee Handbook

3. Faculty/Staff Responsibilities

Employees of the Office of Human Resources, Compliance and Accreditation and Assessment.

4. Definitions/Abbreviations

Employee's "Personnel File" includes records related to performance and training as well as general employment history and other records used for hiring, promotion and disciplinary decisions. The Personnel File shall not include any documentation required to be maintained separately including, but not limited to, reference checks, medical records and certain investigation files. Generally, information or documents must be included if they would be relevant to a manager who may review the file when making employment decisions – items related to the employee's performance, knowledge, skills, abilities or behavior. Benefit enrollment information is maintained in a separate employee file.

5. Procedural Steps

1. 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.
2. All hard copy records will be maintained in locked, secure areas with limited access.
3. 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.
4. Examples of the release of personal employee information that will not be considered a material breach include the following:
 - a. 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.
 - b. Personal telephone numbers or e-mail addresses may be distributed to department head in order to facilitate company work schedules or business operations.

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- c. Employee identifier information used in salary or budget planning, review processes and for timekeeping purposes will be shared with department heads.
 - d. Employee's company anniversary or service recognition information will be distributed to appropriate department heads periodically.
 - e. Employee and dependent information may be distributed in accordance with open enrollment processes for periodic benefit plan changes or periodic benefits statement updates.
5. Burrell maintains strict confidentiality of employee 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.
 6. If an employee wishes to review their employee file, the employee will need to request in writing to schedule a time with the Office of Human Resources to do so. No employee may alter or remove any document from his or her personnel file which must be viewed in the presence of the Office of Human Resource personnel.
 7. Employee Personnel Files are considered to be the property of Burrell and Burrell has the responsibility to maintain and safeguard them. BCOM will not release copies of an employee's Personnel File except as required by applicable law, rule or regulation.

Garnishments/Levies/Support Orders

1. 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

1. 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

1. 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).

6. Reports/Charts/Forms/Attachments/Cross References

None

7. Maintenance

Human Resources; to be reviewed every January.

8. Signature

Signature on File
VP Administration/CFO

12/01/21
Date

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9. Distribution List

Internal/External

10. Revision History

Revision Date	Subsection #	Summary of Changes	New/Cancellation/ Replacement Procedure? (if applicable)	Approval Date
7-25-19	4 ; 7	Clarified definition; Added Section		7/25/19
12.1.2021	All	Updated links changed BCOM to Burrell		12.12021