

Great Rivers Behavioral Health Administrative Services Organization

Policy Title:	Personnel Files & Employment Information	Policy No. 9020.00
Category:	Employment Policy Manual	Date Adopted: 04/09/2021 Date Revised:
Reference:		

Purpose & Scope

- 1.1. The purpose of this policy is to provide guidelines on personnel file maintenance and access and references. These guidelines apply to personnel files at the employee's department and Human Resources.

Personnel File – Type & Location

- 2.1. Employees will have four (4) personnel-related files:
 - 2.1.1. Official Personnel File - maintained by Human Resources.
 - 2.1.2. Supervisory File - maintained by the employee's supervisor(s).
 - 2.1.3. Medical & Benefits File - maintained by Human Resources.
 - 2.1.4. Payroll Records – maintained by the Financial Unit.
- 2.2. Supervisors and managers are responsible for forwarding any item to be included in the personnel and medical files and may retain a copy for the supervisory file, if needed.
- 2.3. Employees requesting a copy of their personnel file will be provided one (1) copy at no cost once every twenty-four (24) months. Employees may inspect their personnel files, upon request, at least once every twelve (12) months.
- 2.4. Official documents will not be permanently removed from an employee's personnel file(s) without a written request and approval by their supervisor. The supervisor will notify and consult with the HR representative and discuss the request and recommendation before a decision is made. Although documents may be removed from the personnel file, it does not mean they will be destroyed, but the documents will be relocated to the HR record archive system. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) shall determine if there is any irrelevant or erroneous information in the file(s) and shall remove all such information from the file(s). If Great Rivers BH-ASO rejects an employee's request to remove erroneous or irrelevant information from the employee's personnel file, the employee may at their request provide a statement containing the employee's rebuttal or correction which will be placed in their personnel file. A former employee shall retain the right to rebuttal or correction for a period of two years following their separation from employment.
- 2.5. Employees have a responsibility to keep their personnel information up to date, and should notify the Human Resources Department in writing of any changes to their:
 - 2.5.1. Name;
 - 2.5.2. Address;
 - 2.5.3. Telephone number;

- 2.5.4. Marital status (for benefits and tax withholding purposes only);
- 2.5.5. Number of dependents;
- 2.5.6. Addresses and telephone numbers of dependents and spouse or domestic partner (for insurance purposes only);
- 2.5.7. Beneficiary designations for any Great Rivers BH-ASO insurance, disability plans, and the Department of Retirement Systems;
- 2.5.8. Persons to be notified in case of emergency.

- 2.6. Employees who have a change in the number of dependents or marital status should complete a new W-4 for income tax withholding purposes.

Internal Access to Personnel Files

- 3.1. Human Resources is responsible for maintaining the integrity, security, and confidentiality of the official personnel file, and the supervisors are responsible for ensuring that their supervisory records are kept confidential. If an employee changes work location, the employee's new supervisor is responsible for obtaining the employee's existing local file in a confidential manner.
- 3.2. Supervisors should be aware that their notes, logs, diaries, or other records related to employees or work issues may be subject to disclosure in legal proceedings.
- 3.3. When records and files are requested for inspection or view, the record guardian or designee will be required to be present during the inspection of personnel or any other Great Rivers BH-ASO employment original records to ensure file security. Internal access to an employee's personnel files is limited to the following individuals when they provide proper identification:
 - 3.3.1. Official Personnel File:
 - 3.3.1.1. The Employee or Designee
 - 3.3.1.1.1. Within reasonable time upon request
 - 3.3.1.2. Employee's Designee
 - 3.3.1.2.1. With signed release or court order, and upon provision of adequate identification
 - 3.3.1.3. Supervisor
 - 3.3.1.3.1. Within reasonable time upon request
 - 3.3.1.4. Chief Executive Director (CED)
 - 3.3.1.4.1. Within reasonable time upon request
 - 3.3.1.5. Human Resources
 - 3.3.1.5.1. Unrestricted Access
 - 3.3.2. Supervisory File:
 - 3.3.2.1. The Employee or Designee
 - 3.3.2.1.1. Within reasonable time upon request
 - 3.3.2.2. Employee's Designee
 - 3.3.2.2.1. With signed release or court order, and upon provision of adequate identification

- 3.3.2.3. Supervisor
 - 3.3.2.3.1. Unrestricted Access
- 3.3.2.4. CED
 - 3.3.2.4.1. Within reasonable time upon request
- 3.3.2.5. Human Resources
 - 3.3.2.5.1. Within reasonable time upon request
- 3.3.3. Medical File
 - 3.3.3.1. The Employee or Designee
 - 3.3.3.1.1. Within reasonable time upon request
 - 3.3.3.2. Employee's Designee
 - 3.3.3.2.1. With signed release or court order, and upon provision of adequate identification
 - 3.3.3.3. Supervisor
 - 3.3.3.3.1. For records related to employee requests for FMLA leave or reasonable accommodations for a disability, access is limited to information regarding necessary restrictions on the work or duties of an employee and necessary accommodations. All other medical information will be made available within a reasonable time upon request.
 - 3.3.3.4. CED
 - 3.3.3.4.1. For records related to employee requests for FMLA leave or reasonable accommodations for a disability, access limited to information regarding necessary restriction on the work or duties of an employee and necessary accommodations. All other medical information will be made available within a reasonable time upon request.
 - 3.3.3.5. Human Resources
 - 3.3.3.5.1. Unrestricted Access
- 3.3.4. Payroll Records
 - 3.3.4.1. The Employee or Designee
 - 3.3.4.1.1. Within reasonable time upon request
 - 3.3.4.2. Employee's Designee
 - 3.3.4.2.1. With signed release or court order, and upon provision of adequate identification
 - 3.3.4.3. Supervisor
 - 3.3.4.3.1. Within reasonable time upon request
 - 3.3.4.4. CED
 - 3.3.4.4.1. Within reasonable time upon request
 - 3.3.4.5. Human Resources

3.3.4.5.1. Within reasonable time upon request

Requests for Employment Information

- 4.1. All verifications of employment, regardless of reason, will be processed by the HR representative or Finance staff. Requests may require full name and an "identifier" such as social security number and/or date of birth, to ensure correct staff identification. Responses to requests for verifications of employment will only include "basic employment verification information":
 - 4.1.1. Date of employment, date of termination, or whether the employee is currently employed;
 - 4.1.2. Employment status – full-time or part-time, regular or temporary, or project staff;
 - 4.1.3. Position currently held and Department/Unit.
- 4.2. Any requests requiring additional information besides "basic employment verification information" in connection with Great Rivers BH-ASO employment must be submitted in writing (fax, email, or mail) to the Great Rivers BH-ASO HR representative and include a signed release to access/receive that information. It is the employee's or ex-employee's responsibility to be cognitive and well informed of the release forms they have signed and of what access they are authorizing. Great Rivers BH-ASO will respond to specific requests for information in our records or access to such records if there is an adequate signed authorization and release to receive or access that information. Great Rivers BH-ASO will retain a record of the inquiry, the release and the response, and information provided will become a part of the personnel file or medical file, as applicable.
- 4.3. Employees should also be aware that under the State of Washington Public Records Act (RCW 42.56) certain personnel records may be subject to disclosure under various public records disclosure requests. Disclosures under such requests which are allowed by the Public Records Act will not require a signed release of information, except for the compliance with the Great Rivers BH-ASO process for requesting public records.

Health Information

- 5.1. This topic is also covered under the Benefits policy, which addresses how your personal health information (PHI) is handled for the purposes of health and welfare benefits administration.
- 5.2. Medical information in connection with an individual's employment relationship with the employer may not be subject to the same legal restrictions as other medical information. This may include information related to Workers' Compensation, employment or discipline drug testing, job-related inoculation, Family and Medical Leave and other leave benefits, long-term disability, or other Great Rivers BH-ASO personnel and benefits administration purposes. Nonetheless, Great Rivers BH-ASO is committed to practice applicable privacy standards when handling employees' information.
- 5.3. Applicable actions with respect to privacy standards:
 - 5.3.1. Great Rivers BH-ASO does not expect exposure to PHI except through employment administrative matters or programs or at the employee's or covered dependent's request. Great Rivers BH-ASO will handle PHI in a manner that complies with privacy protocols.
 - 5.3.2. When necessary, PHI will be handled by authorized Human Resources Department staff, supervisors, or a designated payroll clerk. Employees, other than those listed

above, who encounter other employees' PHI must maintain the confidentiality of this information, refrain from further handling, and immediately refer it to any of the authorized PHI handlers. Employees or their covered dependents may request assistance from a Great Rivers BH-ASO representative that requires the representative's access and handling of PHI. In such cases, the request of an employee or covered dependent must be accompanied by an authorization for release of medical information.

- 5.3.3. Other uses and disclosures of health information not covered by this notice or the laws that apply to Great Rivers BH-ASO employees will be made only with the individual's written permission. A permission to disclose information may be revoked at any time in writing. Great Rivers BH-ASO will no longer disclose health information about individuals for the reasons covered by a revoked written authorization, except to the extent that we have already taken action in reliance on the authorization.
- 5.3.4. Great Rivers BH-ASO has received assurance from its group health plans and/or its third-party administrators of their intent to comply with privacy regulations by establishing privacy and security protocols covering protected health information and electronic data interchange, as well as assuring that their business associates are also in compliance through business associate agreements, where applicable.

POLICY SIGNATURE

DocuSigned by:
Vickie L. Raines
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6/11/2021

Vickie Raines, Chair Great Rivers BH-ASO
Governing Board

Date