

## The Right Door for Hope, Recovery and Wellness

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|--|---------------|--------------------|--------------------------|---|
| Chapter Title                            | Section Title | Section #          |                          | Subject #   |
| Human Resources                          | Employment    | HR                 |                          | 560   |
| Subject Title<br><b>Employee Records</b> |               | Adopted<br>6/28/04 | Last Revised<br>07/22/19 | Reviewed<br>10/25/04; 6/26/06;<br>3/26/07; 8/21/07<br>12/17/08; 1/24/11;<br>2/27/12; 4/22/13;<br>7/28/14; 5/18/15<br>5/23/16; 06/26/17;<br>6/25/18; 7/22/19 |

### **POLICY**

#### **Application**

This policy shall apply to all employees, prospective employees, contractors, interns and volunteers of The Right Door for Hope, Recovery and Wellness.

#### **1.0 Confidentiality of Information**

All employee information obtained through background checks, including driving records, will be kept confidential to the fullest extent possible and allowable under law. The information will be held in confidential files within the Human Resources Office, available to the CEO, and reviewed only as necessary in determining the relevancy and potential impact on the individual's performance of the job for which they are applying or are currently employed.

#### **2.0 Employee Records and Access**

- 2.1 All employees shall have access to their individual personnel file and employee medical files as provided by Michigan law. The employee may review their personnel file and/or employee medical files, consistent with the Employee Right To Know Act, in the presence of Human Resources staff, upon request.
- 2.2 An employee may submit to the CEO a written explanatory statement regarding information in their file for insertion in the file.
- 2.3 Human Resources staff shall maintain all employee personnel files and employee medical files. The employee's immediate supervisor, Compliance Officer and the CEO shall have access to an employee's personnel record on a "need to know" basis.
- 2.4 Employee medical files and records related to Worker's Compensation issues will be maintained in files separate from the personnel files.
- 2.5 All personnel files, employee medical files, criminal background records, and workman's compensation records will be kept in separate locked files.
- 2.6 It is the employee's responsibility to report to Human Resources any address, phone, or other contact changes in a timely manner.

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**3.0 Request for References**

Employees shall refer all requests for professional/educational references for current and former employees to the Human Resources Department. The Human Resources Department shall respond to the request for references according to established written procedures.

**References**

- Health Insurance Portability and Accountability Act (HIPAA) of 1996, PL104-191
- Family Educational Rights and Privacy Act (FERPA), 200USC, 1232; 34 CFR Part 99
- Gramm-Leach-Bliley Act (GLBA) 15 USC 6801-6809
- Insurance Code of 1956, PA 218, MCL 500.537 and 500.539
- CARF, Business Practices, Workforce Development and Management, Health & Safety
- Bullard Plawecki Employees Right to Know Act, Act 397 of 1978

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| Nancy Patera, Board Chairperson | Date |  |  |