

Policy: **Personal Health Information (PHI)**

Policy Number: **I-16**

Responsible for Policy: Human Resources

Approval Date: March 2011

Most recent review: Fall 2012

Date of most recent revision *(if applicable)*: N/A

Policy Statement

Finger Lakes Community College Human Resources Office shall maintain personal health information for College employees in compliance with state and federal laws and regulations.

All individually identifiable health information is shall be maintained separately from employees' personnel files and any personal health information (PHI) in individual employee folders shall be retained in a secure location (locked file cabinet).

Individually identifiable health information is shall be retained in accordance with the requirements of the Records Retention and Disposition Schedule MI-1, NYS Education Department, NYS Archives.

Reason for Policy

This policy exists to govern and ensure the privacy of employee personal health records at the College.

Applicability of the Policy

All College employees should be familiar with this policy.

Definitions

None

Related Documents

- Records Retention & Disposition Schedule MI-1, NYS Education Department, NYS Archives
- HIPAA (§164.501)
- Family Medical Leave Act
- Americans with Disabilities Act

Procedure: **Personal Health Information (PHI)**

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Procedures

Individually Identifiable Health Information (IHI) that is part of employer records

Types of IHI that are included in FLCC's employer records and not subject to HIPAA (§164.501) include, but are not limited to, the following:

1. Certification of a physician/practitioner under the Family Medical Leave Act
2. Accessibility/accommodation requests under the Americans with Disabilities Act
3. Physician notes concerning an employee's ability/inability to work due to a disability (work and non-work related)

Creation, Storage, and Disposal of IHI

IHI held and used by Finger Lakes Community College is provided by employees and is retained in the Human Resources Office.

Access to this information is limited only to the Human Resources Office staff members. In order to maintain confidentiality, all information identified for disposal will be shredded by Human Resources personnel.

Forms/Online Processes

- None

Appendix

- None