



Applies to: Faculty, staff, graduate associates, and student employees

Responsible Office

Office of Human Resources

POLICY

Issued: 10/01/1977
Revised: 06/15/2017

University personnel records should be accurate, relevant, and safe from improper disclosure. Federal and state laws require that certain information be gathered and maintained in personnel files. Sound personnel decisions require that the university collect and retain information concerning employment history and performance. Personnel records are public records subject to exemptions set forth in Ohio law.

Purpose of the Policy

To provide guidance on how to assemble and maintain personnel files and ensure that such files are preserved and consistent throughout the university.

Definitions

Term	Definition
Education records	Any records, other than directory information (e.g., name and address), directly related to a student and maintained by the university, including employment records of an individual employed as a result of their status as a student.
Intellectual property records	Most research-related information, other than financial or administrative data, that has not previously been publicly released, published, or patented.
Investigatory records	Primarily the records of a police department, but also includes, but is not limited to, administrative investigations.
Medical records	Any documents pertaining to medical history, diagnosis, prognosis, or medical condition that are generated and maintained in the process of medical treatment.
Personnel file	An employee's official file containing records that serve as a chronology of the employee's history with the university.

Policy Details

- I. Personnel Files
 - A. Creation and Contents
 - 1. Each employee only has one university **personnel file**, which is maintained by the employing unit.
 - 2. An employee's personnel file contains only necessary job-related information (e.g., hiring records, position description, performance records).
 - a. Personnel records must be shared with the employee prior to being placed in the personnel file.
 - b. Records contained in the Human Resources Information System are considered part of the personnel file. These records are not a substitute or replacement, nor do they alone meet the requirements for each employee having a personnel file.
 - B. Records to be Maintained Separately from the Personnel File
 - 1. **Education records, medical records, investigatory records, intellectual property records**, promotion and tenure records, and attorney-client privileged communications, are not part of the personnel record.
 - 2. The Office of Academic Affairs is responsible for maintaining the official promotion and tenure files for faculty members as the office of record.
 - C. Transfer and Rehire



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1. When an employee transfers from one employing unit to another, the responsibility for the personnel file and controlled access file is transferred to the senior human resource professional (SHRP) or designee in the new employing unit.
 2. When an employee is rehired within six years of leaving the university, the employing unit is responsible for locating the employee's previous personnel and controlled access files from the last employing unit for their continued use. If the previous personnel and/or controlled access file is unable to be located, the employing unit must create a new personnel and/or/controlled access file and document the inability to locate the previous file(s).
 3. When an employee is rehired more than six years after leaving the university, a new personnel file and controlled access file must be created.
- D. Records Retention
1. SHRPs or designees must adhere to the applicable records retention schedule(s).
 2. A personnel file may contain several records. Each record within the file must be maintained or destroyed according to the university or unit retention schedule for that specific record.
 3. For more information, see the [General Records Retention Schedule](#) for the university retention schedule and [University Archives](#) for unit retention schedules.
- II. Supervisory Files
- A. If a supervisory file exists for the employee, it is not part of the personnel file and must be maintained in a secure location within the employing unit.
 - B. See [Personnel File Setup](#) for more information on supervisory files.

PROCEDURE

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- I. Creation and Maintenance of Personnel Files
 - A. Requirements for creating employee personnel files are found in [Personnel File Setup](#).
 - B. The SHRP or designee must determine personnel file maintenance for the unit consistent with [Personnel File Setup](#).
 - C. The personnel file must be maintained consistent with [Institutional Data](#) policy.
- II. Transferring the Personnel File
 - A. When an employee transfers from one employing unit to another, the personnel file and the employee's controlled access files become the responsibility of the SHRP or designee of the new employing unit.
- III. Access to Personnel Files
 - A. In accordance with and to the extent permitted by the [Ohio Public Records Act](#), current and former employees may request to inspect or obtain a copy of their own personnel files by contacting the appropriate SHRP or designee, who will respond to such requests within a reasonable period of time.
 - B. Requests for internal access to another individual's personnel files should be made to the SHRP or designee. The SHRP or designee will ensure the requestor has a legitimate job-related need to access such files, and will respond to such requests within a reasonable period of time.
 - C. Requests for personnel files other than requests described in Procedures III.A and III.B are generally considered public records requests and should be processed accordingly. For more information, see the [Public Records](#) policy.
- IV. Disputing Information in the Personnel File
 - A. Employees who question the accuracy or completeness of information in their files should discuss their concerns with the appropriate SHRP or designee.
 - B. The SHRP or designee will consider the objections and determine the appropriate resolution.
 1. Should the disputed information be retained in the file, the employee may submit a brief written statement identifying the alleged errors or inaccuracies. The statement will remain in the file as long as the disputed information is retained.



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2. Should the disputed information be removed from the file, its removal must be documented.
- V. Public Records Requests for Personnel Files
- A. Records maintained in a personnel file are generally considered public records under Ohio law. When a public records request is made, documents or information such as social security numbers, home addresses, personal telephone numbers, and employee ID numbers may require redaction or withholding pursuant to law.
 - B. Some records contained in personnel files or otherwise maintained by the university are not public records, including but not limited to, medical or educational records, intellectual property records, investigatory files, and any other records made confidential by law.
 - C. For guidance concerning public records requests for personnel files, contact:
 1. The appropriate SHRP or designee,
 2. The appropriate employee and labor relations (ELR) consultant in the Office of Human Resources (OHR), or
 3. For non-routine requests, Public Records within the Office of University Compliance and Integrity (OUCI).
 - D. When a public records request is made to examine personnel records of a current employee (excluding those described in Procedures III.A and III.B), to the extent practical, the university office will attempt to notify the employee of the request. Efforts to notify the employee may not delay timely processing of or responding to the request. Such notification may include that the file has been requested and the name of the person or entity making the request. Consult with the Office of Human Resources for guidance on the notification process.
 - E. The university may verify information (e.g., employment status, job title) without notifying the employee involved.
 - F. The university will cooperate as appropriate with law enforcement investigators, public safety officers, and other officials as necessary.

Responsibilities

Position or Office	Responsibilities
Office of Human Resources	Consult with units regarding this policy.
Senior Human Resources Professional (SHRP) or designee of employing unit	<ol style="list-style-type: none"> 1. Assemble and maintain personnel file. 2. Determine personnel file maintenance consistent with Personnel File Setup. 3. Maintain the following records separate from the personnel file: education records, medical records, investigatory records, intellectual property records, promotion and tenure records, and attorney-client privileged communications. 4. Ensure the personnel file is complete and accurate. 5. Follow all applicable records retention schedules. 6. Respond to current and former employees who request to inspect or obtain a copy of their own personnel files. 7. Provide internal access to university personnel who have a legitimate job-related need to access. 8. Respond to public records requests per Ohio Public Records Act or consult with the ELR consultant in OHR or the Public Records Office in OUCI for non-routine requests. 9. Consult with the Office of Human Resources to notify employees, when practical, when public records requests have been made for the employee's personnel file and who requested the records.
Employee	Provide and maintain accurate personal information such as address, emergency contact, or phone number.
Public Records in OUCI	Provide guidance on responding to non-routine public records requests.

Resources

- University policies:
 - General Records Retention Schedule, library.osu.edu/documents/records-management/general-schedule.pdf
 - Institutional Data policy, cybersecurity.osu.edu/sites/default/files/institutionaldata.pdf
 - Public Records policy, compliance.osu.edu/PublicRecordsPolicy.pdf
 - Privacy and Release of Student Education Records policy, registrar.osu.edu/policies/privacy_release_student_records.pdf



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- Additional resources:
 - Personnel File Setup, hr.osu.edu/wp-content/uploads/policy120-personnel-file-setup.pdf
 - Personnel Records Frequently Asked Questions, hr.osu.edu/wp-content/uploads/policy120-faq.pdf
 - Required Personnel Documents Classifications (for electronic personnel files), hr.osu.edu/wp-content/uploads/policy120-required-personnel-docs.pdf
 - Non-Required Personnel Documents Classifications (for electronic personnel files), hr.osu.edu/wp-content/uploads/policy120-nonrequired-personnel-docs.pdf
 - Ohio Public Records Act, codes.ohio.gov/orc/149.43
 - FERPA information, www2.ed.gov/policy/gen/guid/fpco/index.html

Contacts

Subject	Office	Telephone	E-mail/URL
Policy clarification, procedures	Employee and Labor Relations, Office of Human Resources	614-292-2800	hr-elr@osu.edu hr.osu.edu/services/elr
Faculty promotion and tenure records	Office of Academic Affairs	614-292-5881	oaa.osu.edu
Public records requests, interpretation, and responses	The appropriate unit SHRP or designee, or The appropriate ELR Consultant in OHR		
Non-routine public records requests	Public Records, OUCI	614-292-6459	publicrecords@osu.edu compliance.osu.edu/public-records
Legal guidance regarding records requests	Office of Legal Affairs	614-292-0611	legal.osu.edu

History

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