



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

Responsible Office

Office of Human Resources

POLICY

Issued: 10/01/1977
Revised: 06/10/2024 (minor revision)

University personnel records should be accurate, relevant, and safe from improper disclosure. 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. Federal and state laws require that certain information be gathered and maintained in **personnel files**.

Purpose of the Policy

To provide guidance on how to assemble and maintain personnel files and other personnel records.

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.
Centers of Expertise (CoE)	Teams in the Office of Human Resources who provide specialized services based on their specific subject matter expertise.
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	A specific type of personnel record that is an employee's official file containing records that serve as a chronology of the employee's history with the university.
Unit	College or administrative unit.

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, as outlined in Procedure I.A.
 - 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 may also be 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. Personnel records to be maintained separately from the personnel files
 - 1. **Education records, intellectual property records, investigatory records, medical records**, promotion and tenure records, and attorney-client privileged communications are controlled access records and are not part of the personnel file.
 - 2. The Office of Academic Affairs is responsible for maintaining the official promotion and tenure records for faculty members as the office of record.



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- C. Transfer and rehire
 - 1. When an employee transfers from one unit to another, the personnel file and controlled access records become the responsibility of the new unit's Human Resource Business Partner (HRBP) or designee.
 - 2. When an employee is rehired by the university:
 - a. If their former personnel file is still active, new records must be added to the existing personnel file.
 - b. If their former personnel file is inactive or has been deleted in accordance with the university's [record retention schedule](#), a new personnel file must be created.
 - D. Records retention
 - 1. **Centers of Expertise (COEs)** within the Office of Human Resources (OHR) and unit HRBPs or designees must adhere to the applicable [records retention schedule\(s\)](#).
 - 2. Each record within the personnel file must be maintained or destroyed according to the university or unit retention schedule for that specific record.
 - 3. For more information, see the [university's retention schedules webpage](#) for the OSU General Records Retention Schedule and Unique 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 by the employee's manager.
 - 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. CoEs and unit HRBPs or designees must place records in the personnel file consistent with [Personnel File Setup](#).
 - C. The personnel file must be maintained consistent with the [Institutional Data policy](#).
- II. Employee Transfer Impact on Personnel File Maintenance
 - A. When an employee transfers from one unit to another, the personnel file and the employee's controlled access records become the responsibility of the HRBP or designee of the new unit.
- III. Access to Personnel Files
 - A. In accordance with and to the extent permitted by the [Ohio Public Records Act](#), employees may request to inspect or obtain a copy of their own personnel file. Current employees should contact their unit HRBP or designee, who will respond to such requests within a reasonable period of time.
 - B. A request for internal access to another individual's personnel file should be made to the appropriate HRBP or designee. The HRBP or designee will ensure the requestor has a legitimate job-related need to access the file, and will respond to such requests within a reasonable period of time.
 - C. Former employees may request a copy of their personnel file from [Employee and Labor Relations](#) (ELR). [ELR](#) will consult with the Office of University Compliance and Integrity (OUCI), Public Records, prior to responding to the request.
 - D. Requests for personnel files other than requests described in Procedure III.A are generally considered public records requests and should be processed accordingly. For more information, see the [Public Records policy](#).



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IV. Disputing Information in the Personnel File

- A. Employees who question the accuracy or completeness of information in their personnel files should discuss their concerns with the appropriate HRBP or designee.
- B. The HRBP 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 which identifies the alleged errors or inaccuracies. The statement will remain in the file as long as the disputed information is retained.
 - 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, driver’s license information, home addresses, personal telephone numbers, email addresses, and employee ID numbers may require redaction or withholding pursuant to law.
- B. For guidance concerning public records requests for personnel files, contact:
 - 1. The appropriate HRBP or designee,
 - 2. The appropriate [ELR](#) consultant in OHR, or
 - 3. For non-routine requests, OUCI, Public Records.
- C. When a public records request is made to examine the personnel file of a current employee (excluding those described in Procedure III.A), to the extent practical, the responding university office will attempt to notify the employee of the request.
- D. The university may verify information (e.g., employment status, job title) without notifying the employee involved.
- E. The university will cooperate as appropriate with law enforcement investigators, public safety officers, and other officials as necessary.

Responsibilities

Position or Office	Responsibilities
Centers of Expertise (CoE)	1. Ensure that personnel files are maintained consistently with applicable records retention schedule(s). 2. Ensure contents of personnel file are consistent with Personnel File Setup requirements.
Employee and Labor Relations (ELR)	Consult with OUCI prior to responding to former employees’ requests for copies of their personnel files.
Employing unit	Maintain personnel files.
Human Resource Business Partner (HRBP) or designee	1. Ensure each employee has a personnel file that is retained consistently with the university’s retention schedule. 2. Ensure contents of personnel file are consistent with Personnel File Setup requirements. 3. Process requests for personnel files as set forth in the policy. 4. Consult with ELR regarding notifying employees, when practical, when public records requests have been made for their personnel files. 5. Provide guidance concerning public records requests for personnel files.
Office of Academic Affairs (OAA)	Maintain official promotion and tenure records for faculty members.
Office of University Compliance and Integrity, Public Records	Provide guidance concerning non-routine public records requests for personnel files.



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Resources

University Policies, policies.osu.edu

Institutional Data policy, go.osu.edu/idp

Public Records policy, go.osu.edu/public-records-policy

Privacy and Release of Student Education Records policy, go.osu.edu/student-records-policy

Additional Guidance

Family Educational Rights and Privacy Act (FERPA), www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html 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/ohio-revised-code/section-149.43

OSU General Records Retention Schedule, go.osu.edu/retention-schedules

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

Contacts

Subject	Office	Telephone	E-mail/URL
Faculty promotion and tenure records	Office of Academic Affairs	614-292-5881	oaa.osu.edu
Legal guidance regarding records requests	Office of Legal Affairs	614-292-0611	legal.osu.edu
Non-routine public records requests	Public Records, Office of University Compliance and Integrity	614-292-6459	publicrecords@osu.edu compliance.osu.edu/public-records
Policy questions	HR Connection	614-247-myHR (6947)	HRConnection@osu.edu
Public records requests, interpretation, and responses	HR Connection	614-247-myHR (6947)	HRConnection@osu.edu

History

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