



Service Area: Human Resources	YALE NEW HAVEN HEALTH SYSTEM POLICY & PROCEDURES	
Title: Employee Records		
Date Approved: 03/14/2019	Approved by: System Operating Committee	
Date Effective: 05/01/2019	Date Reviewed/Revised: NEW	
Distribution: HR policy standardization update to YNHHS managers. Additional communication by respective HR team to managers. MCN Policy Manager	System Policy Type (I or II): Type I	
Supersedes: Employment Records (NEMG A:3); Employee Records (GH A3); Employee Records (Grimes B:7); Employment Records (BH C:3); Employee Records (YNHH B:7); Licenses and Credentials (GH D3)		

PURPOSE

Yale New Haven Health System (YNHHS) maintains employee records, as required by Federal and State Wage and Hour regulations, and those deemed essential for efficient YNHHS operations.

APPLICABILITY

This policy shall apply to the Yale New Haven Health System (YNHHS), its parent and subsidiary corporations, including but not limited to its Delivery Network hospitals (Bridgeport Hospital, Greenwich Hospital, and Yale New Haven Hospital), Northeast Medical Group, Yale New Haven Care Continuum (d/b/a Grimes Center), Corporate Professional Business Services (CPBS), each of their respective parent and subsidiary corporations, and each affiliated entity owned by or under common ownership and control with any of the foregoing, with the exception of Lawrence + Memorial Hospital, Westerly Hospital and VNA of Southeastern Connecticut.

This policy is applicable except where it is expressly superseded by collective bargaining agreements.

POLICY

It is the policy of YNHHS to maintain employee records, as required by Federal and State Wage and Hour regulations, and deemed essential for efficient YNHHS operations. Employee records must be updated and accessible for authorized business reasons.

Employee Records

A. Mandated Licensure/Registration

As a condition of employment, a current, valid applicable licensure/registration must be obtained and maintained by employees in positions mandated to do so.

YNHHS reserves the right to define additional qualifications for positions beyond those required by applicable law and/or regulation and to consider those qualifications a condition of employment.

B. Access to Employee Records

Employee records must be updated and accessible for authorized business reasons. However, employee records are handled in the strictest confidence and any breach of confidentiality is considered severe (see Confidentiality policy). Employee records are kept in locked file cabinets and locked storage areas and/or in electronic data systems with appropriate security. Documents considered “medical records” are maintained separately and handled in accordance with the rules and regulations pertaining to medical records.

Active employee records are kept for the employment period plus seven (7) years after separation.

PROCEDURES

A. Employee Record Maintenance Procedure

Changes to the employee record are made by the employee and/or management staff or his/her department using the manager self-service or employee self-service tool. The following matrix indicates required authorization:

Type of Change	Authorization Required		
	Employee	1st Level Management	2nd Level Management
Personal information (address, phone, emergency information, marital status)	XX		
Personal information (name, education level)	XX	XX	
Position information (scheduled hours, position class, department change)		XX	XX

Employee Records

Performance Review (pay rate, job performance review)		XX	XX
Changes in Status (personal leave of absence, intermittent leave, termination, casual/per diem, etc.)		XX	XX

a. Employee Responsibility

It is the responsibility of employees to update demographic information as changes occur in the following categories:

1. Name*
2. Home Address
3. Home Telephone Number
4. Marital Status
5. Emergency Notification Data
6. Required Licensure or Registration
7. Education Completed

* An employee's name in the YNHHS Human Resources database must match his/her full legal name. The employee's name on his/her professional license/registration must also be his/her legal name and must match the name in the Human Resources database. It is the employee's responsibility to ensure that his/her name in the Human Resources database and on the license/registration match.

b. Departmental Responsibility

Management staff is responsible for maintaining current employee information in the categories listed below. This data is changed and/or approved using the established procedure under the manager portal. Data changes should be entered prior to the end of the payroll period in which the changes take effect:

1. Employment Status (active, leave, termination)
2. Scheduled Hours
3. Position Classification/Title
4. Pay Rate
5. Job Performance Review

B. Mandated Clinical Licensure/Registration Procedure

1. Employee responsibility:

Employee Records

It is employee's responsibility to obtain and maintain his/her current valid license/registration (See section below on Failure to Maintain License/Registration).

2. Human Resources responsibility:

At the time of initial employment, the Human Resources Department is responsible for verifying current applicable licensure/registration. This may be accomplished through a background check using a third party credential certification organization (CVO) or verifying current applicable licensure.

- i. If no record is found, the applicable licensing agency is contacted for verification and the license number is recorded in the employee's personnel file.
- ii. The Human Resources Compensation department is responsible for reviewing positions to determine licensure/registration requirements.
- iii. Corporate Human Resources Information Systems (HRIS) maintains a licensure database for employees.

3. Departmental responsibility:

- i. To ensure individuals practicing within the department are currently licensed by the applicable licensing/registering agency (pursuant to the provisions of applicable) and for reviewing lists or the manager self-service tool to verify compliance of the mandated licensing requirements.
- ii. Where electronic verification of licensure/registration by Corporate HRIS is NOT available, or at the time of annual license renewal, documenting current licensure by querying the applicable state licensing website and filing the printout of the search results in a central departmental file (organized by licensed expiration date). If the individual's current license does not appear on the website, the applicable licensing agency must be contacted for verification of licensure and to ensure that the website is appropriately updated.
- iii. When verification of licensure/registration for new employees must be made via the applicable licensing website, filing a printout of the search results in the employee's electronic file and ensuring that the new employee's license number and expiration date are entered into the department's tracking system.
- iv. The immediate supervisor informs the Administrative/Executive Director or Senior Vice President and Human Resources of impending action resulting from a failure to maintain a current applicable license.

4. Failure to maintain license/registration

To ensure that licenses are always current, employees must renew their license/registration at least fifteen (15) days prior to the expiration date to allow for any unforeseen circumstances that

Employee Records

may result in a delay in validation.

If the license renewal cannot be verified 15 days before the license expires, a documented verbal warning is issued by the immediate supervisor informing the individual that if the license is not renewed by the last business day of month in which it expires, he/she will be suspended without pay from working and issued a first written warning. Should the license renewal occur prior to the expiration date, the above-referenced documented verbal warning will be rescinded.

The immediate supervisor informs the employee's department head and Human Resources of impending action resulting from a failure to maintain a current applicable license. Failure to maintain current licensure or registration may result in the termination of employment.

C. Access to Employee Records Procedure

1. Access to Employee Records

- i. Employees may review their records after a written request has been submitted to Human Resources. Appointments will be set within seven (7) business days from receiving the request from the employee. Employees must present identification at the time of their appointment. Most employee files are electronic and view access would be provided within the Human Resources office. In the event an employee record is in hard copy, the original may not be removed from the Human Resources office.
- ii. Managers may request an appointment to review their current employees' (not prospective) personnel files. Managers must present identification to a Human Resources staff member.
- iii. Departments may maintain individual employee files in hard copy form. Employees may review their department file by contacting their manager.

2. Copy of File

- i. Most material in an employee's file has been signed by, or reviewed with, the employee (and copies offered) prior to becoming part of the record. Employees may request in writing to Human Resources, a copy of part or all of their personnel file. Employee must present identification when picking up the copy.
- ii. Upon receipt of a written request, YNHHS will have 10 business days to allow a former employee to inspect, and if requested, copy his/her personnel file. If the parties cannot agree on a reasonable location for the inspection/copying, YNHHS may comply with this section by mailing the file within the 10 day time period.

Employee Records

- iii. YNHHS reserves the right to charge employees a reasonable rate per page for copies of their personnel file.

3. Employment Verification

- i. YNHHS verifies basic employment data on active and former employees through an automated employment verification service. This may be done via phone or internet. The basic data includes employment date and job class of an active employee, and separation date for terminated employees.
- ii. The individual employee is responsible for authorizing the release of salary-related information to the verifying organization through the automated employment verification system.
- iii. Employees seeking assistance with obtaining employment verification information should contact HRConnect.

REFERENCES

Confidentiality (YNHHS Human Resources Policy Manual)

RELATED POLICIES