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Policy Name: Personal Health Information - PHI

Policy Number: I-16

Functional Area(s) Responsible: Human Resources

Owner(s) of Policy: Human Resources

Most Recent BOT Approval Date: Mar 2011

Most Recent Review Date: Spring 2025

Most Recent Review/Revision Type: ☐ none ☐ minor/non-substantive ☒ substantive/extensive

Policy Statement:

Finger Lakes Community College (FLCC) is committed to protecting the privacy and confidentiality of health information of the campus community it serves. Health information is strictly confidential and should never be disclosed, nor provided to anyone who is not specifically authorized under the institution's policies or applicable law to receive the information. The Office of Human Resources shall maintain personal health information (PHI) for college employees in compliance with state and federal laws and regulations.

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

Individually identifiable health information i shall be retained in accordance with the requirements of Local Government Retention Schedule (LGS-1)

Reason(s) for Policy:

The purpose of this policy is to ensure the confidentiality, integrity, and security of (PHI) at Finger Lakes Community College (FLCC).

Applicability of Policy:

This policy applies to all employees, including temporary employees' volunteers, contractors, consultants, and students participating in the Federal Work Study program or other similar programs.

Definitions:

Personnel Health Information (PHI): Any information related to the health status, provision of health care, or payment for health care that can be linked to an individual.

Individually Identifiable Health Information (IHI): A subset of health information that includes demographic data and relates to an individual's health. It can also include information about the provision of healthcare or payment for healthcare.

Related Documents:

Local Government Retention Schedule (LGS-1)

HIPAA (§164.501)

Family Medical Leave Act

Americans with Disabilities Act

Procedures:

Any suspected or actual breach of PHI or IHI must be reported immediately to the Office of Human Resources. FLCC shall investigate all reported incidents and take appropriate corrective or disciplinary actions.

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. Supervisors shall refrain from taking medical documentation from employees and should always refer them to The Office of Human Resources. In order to maintain confidentiality, all information identified for disposal will be shredded by Human Resources personnel.

Forms/Online Processes:

None

Appendix:

None