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Township Policy and Procedure

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## Employee Records Confidentiality Policy

### PURPOSE

To maintain confidential employee records separately and in accordance with state and Federal law, and to comply with procedures designed to protect the accuracy and confidentiality of these records.

### SCOPE

This policy applies to the following employee files and records:

Medical Records  
Credit Information  
Immigration Forms

#### 1. Medical Records

- a) A "medical record" is any individually identifiable information, data, or documentation relating to an employee or family members' mental or physical condition. The term includes, but is not limited to, oral, written, or digital information concerning mental or physical condition; medical records; dental records; disability records; workers' compensation records; medical leave records; genetic information; health insurance information; and/or information concerning visits or payments to any health care professional, hospital, emergency room, or other type of short- or long-term care facility.
  - b) **Medical records are not public records.** Medical records are stored in secure files, separate from other employment-related files. Management staff will be provided with medical information only as needed to manage work restrictions, requests for leave, disability accommodations, and medical response protocols (e.g., for an employee with a medical condition requiring particular first aid procedures or to activate notification or cleaning protocols necessary for workplace protections) or to consider as a mitigating factor in a disciplinary process. Employees may authorize, in writing, release of information.
  - c) Medical records shall be maintained pursuant to state and Federal law.
  - d) Medical records shall be maintained by the human resources department.
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## 2. Credit Information


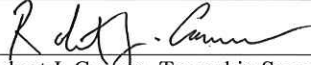
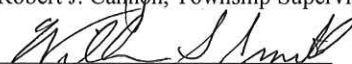
- a) Consumer-related credit information, credit reports, and personal and financial data as defined by the Fair Credit Reporting Act (FCRA) of 1969.
- b) Consumer reports, as defined in the FCRA, are not public records.**
- c) Consumer reports shall be maintained separately pursuant to the requirements of the FCRA.
- d) All consumer-related documents shall be maintained by the human resources department.

## 3. Immigration Forms

- a) Form I-9 and supporting documentation confirming employment eligibility
- b) I-9 forms and supporting documentation are not public records.**
- c) Immigration forms and supporting documentation shall **NOT** be placed in an employee's personnel file to maintain confidentiality and to facilitate inspection if subject to a government audit.
- d) All immigration forms and related documents shall be maintained by the human resources department, and shall be made available for inspection only to authorized officials of the Department of Homeland Security, Department of Labor, and/or other officials designated by Federal law, and appropriate Charter Township of Clinton personnel.

## RESPONSIBILITIES

If an employee becomes aware of a material breach in maintaining the confidentiality of employee personal information, the employee should report the incident to a representative of the human resources department. The human resources department has the responsibility to investigate the incident and take corrective action. Please be aware that a standard of reasonableness will apply in these circumstances.

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Policy Title: Employee Records Confidentiality Policy	
 <p><b>CLINTON TOWNSHIP</b></p>	 Robert J. Cannon, Township Supervisor  William S. Smith, Human Resources Director