# Controller's Office Internal Guidelines for Release of Financial Information

Original: November 15, 2004 Updated: July, 2018

#### In General

- Access to Banner Human Resources or Finance Forms and related Oracle table
  data is granted by the appropriate Data Steward/Managers to the extent that such
  access is required for the performance of the staff member's job responsibilities.
- System IDs and Passwords may not be shared or used by anyone other than the person to whom they were assigned, and each staff member is responsible for taking appropriate precautions to safeguard access to his or her system IDs and passwords.
- Financial transaction, employee pay, and employee benefit information is to be accessed by authorized staff members for necessary University business reasons only.
- All electronic data files regarding pay, benefits or other proprietary financial
  information that is extracted or otherwise maintained on individual personal
  computers of Controller's Office staff must be secured against unauthorized
  access and remain onsite unless otherwise approved by the Controller.
- All LTS published policies for the safeguarding of electronic information will be followed.
- Each Controller's Office employee, including wage and work study students must review and sign a "Statement of Confidentiality and Understanding of Privacy Act Provisions".
- Each manager within the Controller's Office is responsible for training their staff on confidentiality requirements and proper security procedures.
- Documents being mailed containing employee or other sensitive data must be marked as "Personal and Confidential" to the recipient.
- All paper media containing confidential employee or financial information must be shredded when discarded.
- Confidential or otherwise sensitive material must be kept in locked cabinets or otherwise secured in order to prevent unauthorized viewing.
- Any inquiries from the Press must be referred to University Communications.

# **Payroll Office**

#### Employee requests:

Verification of employee identity must be done before any information is obtained or verified with the employee. All requests for supporting benefit information are referred to Human Resources. Individuals who come to the Payroll Office must show picture ID to receive information or pick up their paycheck. All inquiries from gift annuity income beneficiaries are referred to Investment Accounting.

#### Inquiries from campus community:

Access to the Argo Payroll Dashboard is established after verification that the requestor is the Financial Manager or has been designated by the Financial Manager to have access to payroll expense detail.

#### Requests as Result of Criminal Investigation or Legal Proceedings:

All inquiries of this nature, including Patriot Act inquiries, should be reviewed with the General Counsel's Office before any information is released. Information may be provided to support federal agency employment background checks after receiving specific signed authorization from the employee.

# Other Requests from other Outside Parties:

No personal employee information will be released unless required for University business purposes and/or required by law or regulation.

University-wide totals are provided only if required by government regulation or contract (such as insurance contracts). When employee counts are reported, the counts appearing on the Office of Institutional Research web page are used if possible.

Requests for verification of employment and salary for credit purposes are prepared upon written request and with the written permission of the employee.

No information is provided, and paychecks are not distributed, to other individuals (spouse, parent, tax preparer, etc) without specific written authorization of the employee.

# **General Accounting**

#### <u>Inquiries from campus community:</u>

Specific Banner Finance balance/transaction information is released only after verification that the requestor is the Financial Manager or has been designated by the Financial Manager to have viewing access for the index. If the requestor does not meet such criteria, the Financial Manager must provide authorization, preferably written, for the release of information to them.

Banner Finance electronic report distribution is established after verification that the requestor is the Financial Manager or has been designated by the Financial Manager to have access to finance detail.

Internal requests for University-wide financial data are supported based on: a) a demonstrated need for the information; b) determination whether such information is generally made available on campus as part of published documents such as the audited financial statements. Any financial information that is released is based on, or calculated consistently, with, other published financial information. Release of research information is coordinated with Research Accounting.

# Access to Banner Finance by Faculty/Staff Outside of Controller's Office:

Access to information on Banner indexes via Banner Forms, Web Self-Service, Argos or Microsoft Access, is coded within Banner Finance based upon information provided by the Financial Manager at the time the index is established.

# Requests from outside parties:

The Controller's Office prepares responses to selected financial surveys, generally as part of a University-wide effort or at the request of the Vice President of Finance and Administration. Outside vendor access to University financial data, as part of a consulting or service engagement is contingent upon the receipt of an approved professional services agreement that contains appropriate liability and confidentiality provisions.

The University's audited financial statements are posted on the Controller's Office website.

#### Tax:

Requests for copies of the University's Form 990 or 990-T are honored promptly in accordance with IRS regulations.

#### **Accounts Payable**

#### Requests from campus community:

Information on payment transactions on a particular index is provided only to the Financial Managers or Authorized Signers for that index. Financial information concerning vendor payments is provided to selected departments based on a demonstrated need for the information.

#### Requests from vendors:

Vendor requests for payment status information are met if caller demonstrates that they are the vendor, supported by their knowledge of details of the outstanding invoice.

# Requests from other outside parties:

Information on University vendor payment information is released to outside parties only if required by regulation or signed contract or is approved by the Controller after consultation with the General Counsel's Office.

# **Capital Asset Accounting:**

#### Requests from campus community:

Information regarding the value of University buildings or equipment is released only to the Risk Management, Office of Institutional Research, the Provost's Office and Facilities Planning as appropriately requested. Access to transaction and balance information is handled as described under General Accounting.

#### **Investment Accounting:**

#### Requests from campus community:

Selected individuals external to the Controller's Office, including the Development and Treasurer's Offices, have access to endowment/annuity/life income principal book and market value information as required for business purposes. Other access to transaction and balance information is handled as described under General Accounting.

# Requests from outside parties:

Questions regarding investments and investment managers are referred to the Investment or Treasurer's Office.

Endowment principal book value, market value, and spending information is released to the donor or donor's representative as requested by either the donor, Treasurer's Office, or Development Office and is reviewed by the Treasurer's or Development Office prior to release.

All inquiries from gift annuitants regarding payment, taxes or tax reporting are handled by Investment Accounting. Investment Accounting may refer certain inquiries or communications to the Development Office as appropriate.

1099R tax information is released to the income beneficiary's tax preparer or representative only upon written request of the income beneficiary. Under limited circumstance the income beneficiary may provide verbal authorization with proper confirmation of identity. Such authorization will be confirmed in writing by Investment Accounting.