

Policies and Procedures

<i>SECTION:</i> Administration	<i>NO.</i> 2.2.31.		
<i>CHAPTER:</i> Human Resources	<i>ISSUED:</i> 03/02/16	<i>REV. A</i>	<i>REV. B</i>
<i>POLICY:</i> Pay Transparency Exclusion	<i>PAGE 1 OF 2</i>		

PURPOSE

The purpose of this policy is to define which employees are excluded from the Pay Secrecy Policy in Executive Order 11246 (DOL: Office of Federal Contract Compliance Programs), as amended. The Pay Secrecy Policy protects applicants and employees from discrimination based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees. As of January, 2016 Executive Order 13665 will amend the Pay Secrecy Policy, in part as indicated herein.

POLICY

It is University practice to ensure employees with access to employee pay information, as a regular part of their job duties, are not disclosing pay information. Executive Order 13665—Non-Retaliation for Disclosure of Compensation Information shall not apply to instances in which an employee who has access to the compensation information of other employees or applicants as a part of his/her essential job functions discloses the compensation of such other employees or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing or action, including an investigation conducted by the University, or is consistent with the legal duty to furnish information. Employees who meet these criteria include:

1. Human resource employees who have access to employee pay information via the human resource information system.
2. Employees who have access to (including proxy users) the Creighton Merit System.
3. Finance employees who have access to and/or review employee pay information as part of school/college/division/department budget process.
4. Senior Leadership and Leadership who have access to employee pay information as part of the budget and strategic development process.
5. Employees who have access to or review faculty salary contract information.

SCOPE

This policy applies to those persons identified above as having access to pay information.

PROCEDURES

The Senior Vice President for Operations and the University Provost are responsible for enforcing this policy.

Policies and Procedures

<i>SECTION:</i> Administration	<i>NO.</i> 2.2.31.		
<i>CHAPTER:</i> Human Resources	<i>ISSUED:</i> 03/02/16	<i>REV. A</i>	<i>REV. B</i>
<i>POLICY:</i> Pay Transparency Exclusion	<i>PAGE 2 OF 2</i>		

It is the responsibility of individual supervisors to communicate this policy to the applicable employees identified above. In addition, supervisors may have to counsel said employees whose behavior indicates a lack of awareness of this policy. If any such employee of the University does not adhere to this policy, disciplinary action outlined in the Progressive Discipline Policy may be administered by the employee's supervisor according to his/her discretion.

ADMINISTRATION AND INTERPRETATIONS

For guidance in administering and interpreting this policy, supervisors may contact the University's Human Resources Department, or refer to the Creighton Compensation Guide.

AMENDMENTS OR TERMINATION OF THIS POLICY

Creighton University reserves the right to modify, amend, or terminate this policy at any time.