



Human Resources **Employee Files and Retention**

HR (8.302)
Rev. # 0.1

Date 07/27/2023
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Purpose:

Crain Employee's personal data and other sensitive, confidential information will be protected and comply with the Federal and State record-keeping laws. When possible, secure electronic/ cloud-based storage of files is preferred with permissions given appropriately.

Procedure:

1) Access

- A) Access to employee files and data is strictly limited to those with a need to use the information in their jobs. The Director of HR will control access.
- B) Employees may request information in their file and may request correction of data if anything is incorrect through the HR Director.
- C) Personal information will not be released to a 3rd party without written authorization from the employee unless it is part of auditing or business purposes.

2) Data/File Storage

- A) Employees hired and terminated prior to 2022 will have paper files kept in a secure space for up to 6 years.
 - i) See Records Retention information for records older than six years old.
- B) Current Employees and those hired after 2022 data and files are kept in the following formats:
 - i) EE files keep electronically on Network Drive (HR/ Personnel files) and in HRIS- Bamboo for cloud-based protected storage – See chart below
 - (1) Permissions are limited for each folder- Payroll staff has access to New Hire Paperwork folder. Payroll forms, compensation records have additional security perimeters only for executive management.
 - (2) HR Network Drives are permissions only to Managers & HR
 - ii) Workers Compensation & Auto Accident files kept electronically on Network Drive (HR/ Workers Compensation)
 - iii) Investigation & Complaint information will be kept electronically on the Network Drive (HR/ Discipline & Investigations)
 - iv) HR Network Drive files: draft offer letters, EE compensation info, OSHA Forms, Workers Comp information
 - v) Paper Files: I-9s & IDS & E-Verify to be kept in a separate I-9 folder
 - vi) Background & MVRs- Kept by (ADP, BackgroundsOnline, Confirm Choice)
 - vii) Drug Screening- Kept by Fortier Safety (Screening Company) for 5 years



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3) Employee Records in Bamboo (HRIS)

Folder Name	Items included
Benefits and Leave	FMLA, benefits sign up documents; Disability Claims
Certifications and Training	All training documentation
Medical & Confidential	drug screen, doctors notes, MVR, investigations; Workers Comp information
New Hire Paperwork	EEO, Employee info, W4s, Direct Deposit

Payroll and Compensation	Compensation changes
Performance Review and Development	Performance review and documentation, development plans, training related to development
Resumes and Applications	Resume, Portfolio, Interview notes (also in Bamboo candidate notes) and Applications
Signed Documents	Executed offer letter, signed agreements
Signed Policies	Handbook, MVR, Drug Free Workplace, Harassment Policy
Tasklist Attachments	
Term Documentation	Term letter, unemployment paperwork, exit interview
Workflow Attachments	

4) Records Retention – while retention laws may vary, the following company policy will be followed to ensure compliance.

A) Keep Indefinitely

- i) Work related illness based on exposure to toxic substances (30 years)
- ii) Record of Military Leave, reemployment, and employee benefits during leave
- iii) Basic EE info: Name, SS#, job title, Hire Date, Term Date) either in Employee Database Spreadsheet or in HRIS

B) Keep 7 Years

- i) Workers' compensation claims and corresponding info

C) Keep 6 Years



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- i) EE files after termination
 - ii) OSHA 300, 300A, 301- keep 5 years.
 - iii) ERISA related records (Medical benefits, life and disability insurance, 401k) including:
 - Copies of filed form 5500s; summary annual reports (SARs); plan documents.
 - insurance policies, booklets and certificates; third-party service provider contracts; summaries of material modifications (SMMs);
 - open enrollment materials; summary of benefits and coverage (SBCs); required participant disclosures; COBRA notices, forms, and premium schedules; evidence of nondiscrimination compliance; qualified medical child support order procedure and documentation.
 - HIPAA materials and correspondence; and copies of filed Forms 1094 and 1095 along with substantiating records, if applicable.
 - This information is also kept by Insurance Broker
- D) 1-3 Years
- i) 1-9s 1 year after termination or 3 years from completion, whatever is later