

<b>Title:</b>	<b>Personnel File Maintenance, Retention, and Destruction</b>	<b>Effective Date:</b>	<b>01/07/2016</b>
<b>Author:</b>	<b>Camille Tanner</b>	<b>Last Review Date:</b>	<b>06/23/2021</b>
<b>Location:</b>	<b>Corporate HQ</b>	<b>Last Revision Date:</b>	<b>10/29/2020</b>
<b>Functional Area:</b>	<b>Human Resources</b>		

### POLICY

The Human Resources (HR) Department maintains employee record information and personnel files. This responsibility includes retaining and destroying personnel records in accordance with federal and state laws governing records retention.

### PROCEDURE

IN ACCORDANCE WITH THIS POLICY, THE FOLLOWING EMPLOYEE INFORMATION DOCUMENTS ARE TO BE MAINTAINED IN PERSONNEL FILES:

1. Credentialing pre-employment and annual information
2. Benefit plans records
3. Job descriptions
4. Annual performance reviews
5. Disciplinary actions
6. General employee personnel records

The following employee information documents are to be kept separate from the personnel files:

1. I-9 form
2. Medical or health records
3. EEO complaints
4. Garnishments

Physical Personnel files for all employed or subcontracted personnel are kept in locked cabinets in the locked file room located in Liberty's corporate office filed in alphabetic order in clearly marked cabinets. Advanced practitioners and physician files are kept in separate cabinets which are locked and clearly identified. Keys to this locked room reside with the Office Manager and the Vice President of Human Resources. This room will be locked each evening at the close of business. As of March 2020, personnel files are kept electronically in Liberty's shared drive. Physical files of all currently employed or subcontracted personnel are kept in the file room for the duration of the personnel's tenure with Liberty. Physical files of all terminated employed and subcontracted personnel are kept in the file room for one year after termination. One year after termination, the personnel files for employed and subcontracted personnel will be electronically scanned and stored in Liberty's electronic filing system, On Base. After the electronic conversion of the file, the hard paper copies of the file will be destroyed by shredding. The electronic file may be destroyed ten (10) years after the termination date.

Workers' compensation files will be kept in a locked filing cabinet until the settlement of the Workers' Compensation claim. Files must be retained for thirty (30) years after the settlement of the claim.

If any terminated, employed, or subcontracted personnel is involved in any ongoing litigation, charge, or challenge or, if there is a question that the personnel may be involved in any type of employment charge or challenge, whether formal or informal, the physical file will be kept in the office of the Vice President of Human Resources until such time as the final disposition of the dispute has been concluded. After the final disposition of the dispute the file will be electronically converted and stored in On Base and the physical file will be destroyed by shredding.

*At various Liberty locations, duplicate personnel files may also be kept. These files will be kept in a locked file room with limited access to only those who have a need to work with the files. Ten years after termination the file may be shredded. If the contract at a location terminates, all active personnel files at the time of termination and any files closed less than 10 years will be return to the corporate office and the above process will be followed.*

Forms not kept in personnel files will be retained for the required period of time and then destroyed by shredding. These include:

- I-9 forms - 1 year of termination
- Medical records and safety records – 5 years
- EEOC claims – 2 years after resolution

Approved By: \_\_\_\_\_

### Revision History

Version	Date	Author	Summary of Changes
#1	01/07/2016	Camille Tanner	Policy Created
#2	10/29/2020	Camille Tanner	Policy reviewed with the following changes: as of March 2020, employee/subcontractor files are now electronically stored on the shared drive. One year after termination physical files of all employed and subcontracted personnel will be electronically scanned and stored in Liberty's electronic filing system, On Base. After the electronic conversion of the file, the hard paper copies of the file will be destroyed by shredding.
#3	06/23/2021	Camille Tanner	Reviewed; no changes