



Effective Date: July 1, 2011

Retired:

Revised:

Approved by: WAYNE J. RILEY, M.D., MPH, MBA, PRESIDENT AND CEO

Subject: Human Resources – Personnel Records Policy

PURPOSE: To establish proper guidelines for managing employee personnel information.

POLICY: It is the policy of the Company to maintain personnel records for applicants, employees, and past employees in order to document employment-related decisions, evaluate and assess policies, and comply with government recordkeeping and reporting requirements. Employee files are the property of, and will be maintained by, Meharry. Contents of the employee file may not be released to or photocopied by or for the staff member unless required by law or approved by Human Resources and the Department of Legal Affairs.

(1) The Company tries to balance its need to obtain, use, and retain employment information with a concern for each individual's privacy. To this end, it attempts to maintain only the personnel information that is necessary for the conduct of its business or required by federal, state, or local law.

(2) The Human Resources Department is responsible for overseeing recordkeeping for all personnel information and will specify what information should be collected and how it should be stored and secured.

(3) Employees have a responsibility to keep their personnel records up to date and should notify the Human Resources Department in writing of any changes in at least the following:

- (a) Name;
- (b) Address;
- (c) Telephone number;
- (d) Marital status (for benefits and tax withholding purposes only);
- (e) Number of dependents;
- (f) Beneficiary designations for any of the Company's insurance, disability, pension, and profit sharing plans; and
- (g) Persons to be notified in case of emergency.

In addition, employees who have a change in the number of dependents or marital status must complete a new Form W-4 for income tax withholding

Subject: Personnel Records Policy

purposes within ten days of the change, if it results in a decrease in the number of dependents.

(4) Active staff members may review their personnel file, by appointment, in the Human Resources department. Employees may inspect their own personnel records and may copy, but not remove, documents in the file. All inspections must be conducted in the presence of a designated member of the Human Resources.

(5) Only supervisory and management employees who have an employment-related need-to-know for information about another employee may inspect an employee's Employment File. The inspection must be approved by the Human Resources Department and should be recorded in the file inspected.

(6) Employees should refer all requests from outside the Company for personnel information concerning applicants, employees, and past employees to the Human Resources Department. The Human Resources Department normally will release personnel information only in writing and only after obtaining the written consent of the individual involved. Exceptions may be made to cooperate with legal, safety, and medical officials who need specific employee information. In addition, exceptions may be made to release limited general information, such as the following:

- (a) Employment dates;
- (b) Position held; and
- (c) Location of job site

(7) Former employees will not be allowed access to their Employee file except in response to a legally served subpoena or other compulsory process.

PROCEDURE: Payroll Records: All time recording, payroll deduction, pay period totals and other employee pay records will be maintained as determined by the payroll department.

Supervisor Records: Supervisor's may maintain copies of employment related documents in their own files. Documents typically consist of employment applications, resume/CV, performance goals or documentation, annual leave requests, etc. At the time of separation, all documents contained in the Supervisor's File need to be forwarded to Human Resources.

Human Resources will maintain the following records in the manner detailed

Subject: Personnel Records Policy

below.

Applicant information will be organized by position most applicable and kept for one year. After one year all applicants information, whether it is a computer stored or hard copy resume/application will be destroyed.

Employee records will be maintained in five separate filing systems. These systems were determined due to specific confidentiality and recordkeeping laws and best practices. The separate files are the Employee File, Employee Benefit File, I-9 File, Disability File and Workers Compensation File.

Employee File: Employee files will be grouped in two categories (active and terminated). Active employee files will be generated when someone is hired and maintained throughout their employment. Active employee files will contain;

- Employment application, resume, applicant testing, offer letter
- New employment paperwork, W-4, handbook and other signed acknowledgements
- Performance documentation, such as reviews, warnings, accommodations
- Position or compensation change records

At the time of termination the termination year will be written in large print on the outside sleeve of the file and the employee file will be transferred to the terminated file storage. All files of employees terminated over seven years will be destroyed.

Employee Benefit File: Employee benefit files will also be grouped in three categories (active, retiree active and terminated). Active employee benefit files will be generated when someone is hired and maintained throughout their employment. Active and retiree active employee benefit files will contain;

- Pre-employment physicals, medical questionnaires or drug test results
- Benefit enrollment forms or coverage waivers
- Beneficiary designations
- Benefit change forms and change of status documentation, when

Subject: Personnel Records Policy

necessary

- Retiree Benefit Information

At the time of termination the employee benefit file will be pulled from the active employee files. If the employee is a retiree, their file will be put with the retiree active files. If the terminated employee is not a retiree, the termination year will be written on the outer sleeve and the file will be stored for seven years. All employee benefit files of employees who have been terminated for over seven years will be destroyed.

I-9 Files: All I-9 (Employment Eligibility Verification) files will be maintained in separate active and terminated 3-ring binders. Active I-9 forms and any copied verification will be kept in alphabetical order. A log will be kept in the beginning of the binder which will list those employees who have provided documentation which expires and will need reverification.

Once an employee has terminated the destruction date will be written in large print at the top of the form. The destruction date is the later of, three years after date of hire or one year after date of termination. Annually the terminated employee I-9 binders will be purged of expired forms.

Disability Files: All disability files will be maintained separate from the other files. Disability files will include application for STD or LTD payments or FMLA requests. These files will be kept for all active employees and destroyed seven years after separation date.

Workers Compensation Files: All workers compensation files will be kept separate from the rest of the employment files. Each current year there will be a binder which contains the OSHA-300 log and the binder will be arranged by each accident's occurrence date. The information kept will include;

- Tennessee's First Report of Injury
- Meharry's Reportable Event form
- Meharry's Investigation Report
- Copies of all medical treatment information and bills

After each calendar year the files will remain together but be taken out of the



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Subject: Personnel Records Policy

binder and stored by accident year. These records will not be destroyed.