

Purpose: The human resources (HR) department retains and destroys personnel records in accordance with the school district policies on business records retention as well as federal and state laws governing records retention. Below is an outline of the HR department's operating procedures for personnel records retention and destruction of documents when such retention periods have passed. The HR department maintains both employee record information and government compliance reports. Both are subject to the following retention requirements and destruction procedures.

Maintenance of Employee Records

The following employee information records are maintained in segregated personnel files:

- 1) Pre-employment information.
- 2) I-9 forms.
- 3) Benefits plan and employee medical records.
- 4) Health and safety records.
- 5) General employee personnel records.

Government compliance reports are maintained in reverse chronological sequence and filed separately from the above employee information records.

Destruction of Employee and Applicant Records

All paper personnel records and confidential employee data maintained by the HR department will be destroyed by shredding after retention dates have passed; this procedure pertains to all personnel records, not just those governed by the Fair and Accurate Credit Transactions Act (FACTA).

Application materials submitted by applicants for employment who were never employed are also to be shredded.

Personnel records include electronic as well as paper records. The HR department may work with the IT department periodically to review and ensure that the HR department's electronic records relating to employee information and compliance reports are properly purged.

Retention of Terminated Employees' Records

The retention periods for terminated employees' and applicants' records and compliance reports are as follows:

Pre-employment records:	
Résumés, applications and related employment materials, including interview records and notes, for applicants not hired	3 years
Résumés, applications and related employment materials, including interview records and notes, for employees: 4 years after date of termination	4 years
Background checks, drug test results, driving records, company employment verifications, letters of reference and related documents	5 years
Employee records:	
Terminated employee I-9 Forms: The later of 3 years from date of hire or 1 year following termination of employment	3 years or 1 year
Compensation, job history and timekeeping records: 4 years after termination	4 years
FMLA and USERRA and related leave records: 3 years after termination	3 years
Performance appraisal and disciplinary action records: 4 years after termination	4 years
Benefit records: 6 years after the filing date of the documents, based on the information they contain, or 6 years after the date on which such documents would have been filed but for an exemption or simplified reporting requirement	6 years
Disputed issues (records relating to issues 2 years after resolution of dispute involving external agencies or parties, wage-hour investigation by DOL, EEOC charge, arbitrations, court actions, etc.), OSHA and employee safety records: 5 years after termination	5 years
Workers' compensation claims: 30 years after date of injury/illness. NOTE: OSHA has another standard for Access to Employee Exposure and Medical Records [29 CFR 1910.1020]. This standard requires employers to keep employee medical records for the time they are employed plus another 30 years, and exposure records for 30 years	30 years
Vermont's Recordkeeping Requirements	
Vermont's Wages/Hours/Payroll:	
The following information must be retained for 2 years for each employee (note that employers covered by the Fair Labor Standards Act must keep more detailed payroll records for 3 years): Hours worked and Wages paid	2 years or 3 years
Unemployment Insurance:	
<ul style="list-style-type: none"> • For purposes of unemployment, the following information must be retained for 4 years: • For each employee: <ul style="list-style-type: none"> ▪ Address/social security number; ▪ Place of employment; ▪ Wages or salary/frequency of payment; ▪ Date hired or returned to work; ▪ Date/reason for separation; Unemployment Insurance continued: <ul style="list-style-type: none"> ▪ Days worker performed services/hours of work each day; ▪ Total remuneration paid each quarter; ▪ Whether any week was less than full time; ▪ Time lost, if any, and reason; and ▪ Remuneration for each pay period showing separately: <ul style="list-style-type: none"> ▪ Money payments (excluding special remuneration); ▪ Special remuneration of all kinds, showing separately: <ul style="list-style-type: none"> ▪ Money payments; ▪ Reasonable value of non-cash payments; ▪ The nature of special remuneration; and ▪ The period(s) services were performed for special remuneration. ▪ Reasonable value of non-cash remuneration (e.g., lodging, room and board) paid by the employer; ▪ Amount of gratuities received; and ▪ Reimbursements for traveling or other business expenses, dates of payment, and amount of expense incurred by the employee. For each pay period: <ul style="list-style-type: none"> ▪ Dates/amount of remuneration for subject and non-subject employment; ▪ Beginning/ending dates of each pay period; and ▪ Date each week of the largest number of individuals worked/number of employees who worked on that day. 	4 years