
**The Roman Catholic Church of the Diocese of Phoenix
Human Resources Policies and Procedures**

Policy 2-7.1.8 Human Resources Records

The Diocese of Phoenix Human Resources Office maintains human resources files only for employees assigned to the Diocesan Pastoral Center. Diocese of Phoenix parishes, Catholic schools, Catholic Cemeteries, Mount Claret Center and all Newman Centers must establish and maintain employee human resources records in accordance with the guidelines set forth in the following procedures. Specific access restrictions and security procedures for employee records are established. These restrictions and procedures are designed to protect both the privacy of employees and employers from potential liability for improper disclosure of personal information. These records are kept in locked file cabinets or in secure storage.

Documents of a confidential nature (e.g. medical records, insurance forms) will be maintained in the employee's confidential file.

Procedures:

A. Human Resources File Guidelines

1. Human Resources General Employee File

- Resume
- Application
- Reference checks
- Letter of Appointment
- Job Description
- Promotion Information
- Performance Appraisals
- Letters regarding employee performance or specific job duties
- Proof of schooling (if necessary for position)
- Professional certificates
- Training certificates
- Payroll information (W-4, A-4, CDA, CTO, Direct Deposit, United Way, payroll deduction information)*
- Vacation information
- Written discipline actions
- Exit interview upon termination

*See item 4 on next page

2. Human Resources Confidential Employee File

Note: Any information that includes date of birth, age, race, religion, medical and health information or family situations that may allow a supervisor to discriminate should be kept in the confidential file.

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Personal Data Sheet
New Hire/Rehire Reporting Form
Confirmation of submitted AZ New Hire Report
Verification of Employment Requests
Insurance Forms*
401(k) information
Sick Leave Information and return to work release forms (Note: Because of privacy laws, the supervisor should not keep any information concerning illness or return to work release forms in their personal files)
Short term disability information
Long term disability information
Family & Medical Leave Act (FMLA) information
Workers' Compensation records

*See item 4 below.

3. I-9 Forms File

Forms for all active employees are to be kept in a notebook or binder that is stored separately from the human resources general or confidential file.
Forms for terminated employees are to be kept in the back of notebook or in another notebook.

4. Flex-Spending Records

All flex-spending records are kept in a separate locked location in the Diocese of Phoenix Human Resources Office and in accordance with HIPPA Privacy Regulations, no flex-spending records or copies of records are to be kept at any other Diocese of Phoenix location.

B. Employee Review of Human Resources File

Employees may review their human resources file upon written request by making an appointment with the Diocese of Phoenix Human Resources Office or the business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center or Newman Center where they are employed. The human resources file may not be removed from the Diocese of Phoenix Human Resources Office or business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center or Newman Center where they are employed and the file review is to be witnessed by an appropriate authority.

C. Correcting Information Contained in Human Resources File

When employees believe that information contained in their human resources file is incorrect, they may request that the information be corrected. To accomplish this, they must make the request in writing to the Chief Human Resources Officer or other

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appropriate administrative officer at Diocese of Phoenix parishes, Catholic schools, Catholic Cemeteries, Mount Claret Center and all Newman Centers. If the information contained in the human resources file is found to be correct, the employees shall be offered the opportunity to submit a written statement about the matter that will be included in their human resources file. Additionally, employees may request that certain documents (e.g. responses to a disciplinary notice, memos of appreciation, etc.) be placed in their human resources file. The Diocese of Phoenix reserves the right to determine what is placed in the human resources files.

D. Obtaining Copies of Documents From Human Resources Files

Employees may request and receive copies of documents filed in their human resources files. Employees may be charged a fee for reproducing copies from the files.

E. References/Verification of Employment

The Diocese of Phoenix strives to ensure that confidential information is not improperly released either within the Diocese of Phoenix or to external sources. All requests for any information about employees must be referred to the Diocese of Phoenix Human Resources Office, or business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center and all Newman Centers as appropriate. In response to “employment reference” types of inquiries, only dates of employment and job titles will be provided by the Diocese of Phoenix Human Resources Office or business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center or Newman Center unless there is specific written authorization from the employees. In response to “credit” or “income verification” types of inquiries, written authorization from the employees is required for all releases of information. On occasion, other types of information may be provided to outside entities where mandated by law or court order.

F. Change of Employee Information

Employees are responsible for informing their supervisor and the Diocesan Human Resources Office or business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center and all Newman Centers of any changes in name, address, telephone number, social security number, marital status, or other pertinent personal information.

G. Disposition of Departmental Files Upon Separation of Employees

Upon separation of employment, all departmental duplicate files, if any, shall be forwarded to the Diocese of Phoenix Human Resources Office or business office of the parish, Catholic school, Catholic Cemeteries, Mount Claret Center and all Newman Centers where they will be filed with the human resources files.

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H. Human Resources Record Retention

The Diocese of Phoenix will follow the United States Conference of Catholic Bishops Records Retention schedule.

Records Type	Retention Period
Benefits	
Disability records	Permanent
Pension vesting files	Permanent
Retirement benefits	Permanent
Service records	Permanent
General	
Permanent earnings and records	7 years after benefit termination
Attendance records	7 years after termination
Employee contracts	7 years after termination
Employee salary schedules	7 years after termination
Health and Safety	
Accident/injury reports	7 years
Employee medical complaints	7 years
Employee medical records	30 years from termination
Environmental test records/reports	Permanent
Hazardous exposure records	Permanent
Toxic substance exposure reports	Permanent
Workers' compensation records	12 years after injury (filing), death, or last compensation payment
Human Resource actions	
Applications rejected	1 year
Personnel files, terminated	7 years
Termination records	7 years
Salary administration	
W-2 forms	7 years from date of filing
W-4 forms	7 years from date of filing
Time cards/time sheets	4 years from date of filing

Following federal requirements, keep terminated employees' I-9 files for 3 years after hire date or 1 year after separation, whichever date is later.

After separation of employment, keep all human resources files in a secure storage location. After seven years, human resources files that are not permanent may be destroyed in a secure manner.

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If consumer reports (credit reports) are used to establish employment eligibility, the Federal Trade Commission Disposal Rule applies. The Disposal Rule requires disposal practices that are reasonable and appropriate to prevent the unauthorized access to – or use of information in a consumer report. This can be accomplished by: shredding papers so the information cannot be read or reconstructed; destroying or erasing electronic files or media so that information cannot be read or reconstructed; or hiring a document destruction contractor to dispose of material specifically identified as consumer report information consistent with the Rule.

Approved by Bishop Thomas J. Olmsted on October 27, 2006