

# **Records Retention Policy**

**September 21, 2015**

## Purpose

Public records are defined in **Idaho code** 74-101 as any “writing containing information relating to the conduct or administration of the public’s business prepared, owned, used or retained by any state agency, independent public body corporate and politic or local agency regardless of physical form or characteristics.” Idaho code defines public records very broadly. The law also recognizes, however, that public records thus defined vary a great deal in their significance and usefulness. Therefore, a written policy that defines the type of records the agency has and the retention period appropriate to their significance is necessary.

The COMPASS records retention policy:

- Defines the type of records the agency has or may have.
- Classifies those records as permanent, semi-permanent or temporary, in conformity with the guidance in Idaho code.
- Defines the retention schedule for semi-permanent and temporary records in conformity with the guidance in Idaho code and the needs of the agency.
- Identifies that subset of records considered transitory and retained until no longer needed.
- Describes the methods by which the agency shall retain and safeguard its records in conformity with Idaho code and this policy.

## Part 1: Records Definition and Retention Schedule

In the sections below, the types of agency records are defined and classified and the retention schedule is identified.

The definitions, classifications and retention schedules refer to agency **records in all formats, including paper and electronic**. The methods for storing and safeguarding agency records are described in Part 2.

### Section A: Administrative and Program Records

- **Attendance records:** Records documenting attendance at public meetings or other events hosted by COMPASS.

**Temporary:** Keep two years.

- **Awards:** Awards presented to honor citizens or organizations for civic contributions. Records may include award nominations, certificates, ceremony records, photographs, lists of recipients, etc.

**Permanent:** Keep lists of recipients permanently.

**Transitory:** Keep other records related to awards until no longer needed.

- **Calendars and Scheduling Records:** Records including calendars, appointment books, schedules, logs, diaries, and other records documenting meetings, appointments, and other activities of COMPASS staff.

**Transitory:** Keep until no longer needed.

- **Boards, Commissions and Committees:** Bylaws, approved and signed meeting minutes, meeting agendas, meeting packet materials, and meeting presentation materials of the COMPASS board and committees.

**Permanent:** Bylaws and approved meeting minutes for the COMPASS Board and committees

**Semi Permanent:** Meeting agendas and meeting packet materials of the COMPASS board are semi-permanent and shall be kept for 10 years from the meeting date.

**Semi Permanent:** Meeting agendas and meeting packet materials of COMPASS committees are semi-permanent and shall be kept for five years from the meeting date.

- Temporary:** Presentation materials such as PowerPoint slides or handouts that were not included in the meeting packet but were presented at a board or committee meeting are temporary and shall be kept one year from the meeting date.
- Transitory:** Keep notes and recordings for meeting minutes until minutes are officially approved.
- **Comments:** Records including written comments formally submitted on plans, projections, proposed and adopted regulations, and other work product of member agencies and other local, state, or federal agencies.
- Semi-permanent:** Retain written comments formally submitted for five years from the end of the fiscal year in which the comments were submitted.
- **Conferences, Seminars and Workshops:** Records documenting attendance and/or presentations by staff at conventions, conferences, seminars, workshops, and similar events.
- Semi-permanent:** Individual records documenting authorization to attend training conferences, seminars, or workshops are retained with accounts payable records for five years from the end of the fiscal year in which the transaction occurred.
- Semi-permanent:** Records documenting actual expenditures (receipts) for registration and travel for conferences, seminars, and workshops are integrated with other accounts payable records. Accounts payable records are retained for five years from the end of the fiscal year in which the transaction occurred.
- Semi-permanent:** Presentation materials such as PowerPoint slides or handouts related to presentations made by staff at conferences, seminars, and workshops are kept for five years from the presentation date.
- **Contracts and Agreements:** Agreements with vendors and other parties for the acquisition, lease, lease-purchase, or sale of equipment, supplies, services, or property.
- Permanent:** Agreements related to the acquisition, construction, and disposition of real estate and buildings are permanent.
- Semi-permanent:** All other contracts and agreements are retained for five years from the end of the fiscal year in which the contract term expired.

- **Correspondence, General:** Correspondence includes records on various types of media, including paper and email. Correspondence covers day-to-day office matters, scheduling and other routine administrative activities. Correspondence that provides insight into significant policy, program, personnel or other issues is filed with the other documents for the matter to which it relates and is retained according to the schedule for those documents.

**Transitory:** Keep until no longer needed.

- **Development Review Records:** Includes comments prepared by COMPASS and submitted to the approving agency(ies) on proposed development.

**Semi-permanent:** Keep submitted comments for seven years from the end of the fiscal year in which the comments were submitted.

- **Equipment Maintenance and Repair Records:** Records documenting the inspection, maintenance, and repair of COMPASS owned equipment.

**Semi-permanent:** Keep records for equipment that meets the definition of a capital asset provided in COMPASS' Financial Policy for five years from the end of the fiscal year in which the equipment was disposed.

**Temporary:** Keep all other records for equipment maintenance until the equipment is removed from service and disposed.

- **Geographic Information System (GIS) Records:** Data utilized for GIS applications, including underlying supporting information such as population data.

**Permanent:** Source data and underlying supporting data for GIS applications are permanent.

**Transitory:** Keep derived data from analyses of or calculations performed on source data until superseded, obsolete or no longer needed.

- **Historical File:** Includes historical information about COMPASS. May include newspaper clippings, photographs, compiled histories, special events, etc.

**Permanent:** Information with significant historical value is permanent.

**Transitory:** All other historical information is retained until no longer needed.

- **Key and Keycard Records:** Document the issuance of keys/keycards to staff for entrance to the COMPASS building.

**Transitory:** Keep until no longer needed.

- **Legislative Issues:** Records documenting COMPASS' legislative positions.

**Semi-permanent:** Keep five years after the end of the legislative session to which the positions relate.

- **Maps:** Maps created by or for COMPASS.

**Permanent:** Maps created by or for COMPASS are permanent.

- **News Releases:** Prepared statements, announcements, and news conference transcripts issued to the news media by COMPASS.

**Semi-permanent:** Keep five years after issue date.

- **Notary Bond Records:** Bond posted by notaries conditioned on the faithful performance of their duties.

**Semi-permanent:** Keep five years after expiration.

**Note:** Other notary records, including application, appointment, journal, and other records are the property of the notary.

- **Orthophotos and all other aerial photos:** Orthophotos and all other aerial photos created by or for COMPASS.

**Permanent:** Orthophotos and other aerial photos are permanent.

- **Policies and Procedures:** Records documenting governing and operating policies of COMPASS.

**Permanent:** Policies officially adopted by the Board shall be retained until superseded.

**Semi-Permanent:** Policies that were officially adopted by the Board but that have been subsequently superseded, replaced or voided by Board action shall be retained for five years from the date of the Board action.

**Semi-Permanent:** Internal documents describing policies and procedures for COMPASS operations that have not been officially adopted by the Board shall be retained for one year from the date upon which they were superseded.

- **Professional Membership Records:** Records documenting COMPASS-paid individual or agency memberships and activities in professional organizations.

**Semi-permanent:** Keep five years from the end of the fiscal year in which the membership is paid. Membership records are integrated with other accounts payable records for that fiscal year.

- **Public Records Requests:** Includes written public records requests, COMPASS' denials of public records requests, appeals information, etc.

**Temporary:** Keep two years after last action or final disposition of appeal (whichever is longer).

- **Publications:** Includes reports, studies, plans, policies, newsletters, brochures, etc. published by or for COMPASS.

**Permanent:** Keep one copy of official, numbered COMPASS reports permanently.

**Permanent:** Keep reports, studies, plans, policies and other publications with lasting significance permanently.

**Semi-permanent:** Keep one copy of all other publications such as newsletters, brochures, and white papers five years from the date of publication.

- **Public comments, surveys, questionnaires:** Records documenting measurement of public opinion, including comment cards, legal and other notices regarding public meetings and comment periods, surveys, polls, questionnaires, etc.
  - Semi-permanent:** Keep public comment records for five years from the date of the plan or report for which the comments were solicited, or until the related report is superseded, whichever is longer.
  - Semi-permanent:** Keep public comment records that are unrelated to a specific plan or report for five years from the date the records were collected.
- **Purchasing and Quality-Based Selection Records:** Records documenting competitive bidding and purchase of goods and services including: published notices and solicitations, specifications, bids, requests for proposals (RFPs) or requests for qualifications (RFQs), questions and answers related to RFPs or RFQs, responses to RFPs or RFQs, etc.
  - Semi-permanent:** Keep five years from date of award, or cancellation if not awarded. If responses or bids are not received, documentation of efforts to procure bids shall be kept five years from date of initiation of efforts.
- **Records Management Records:** Records documenting the inventory, retention, management, and disposition of COMPASS records.
  - Permanent:** Record retention policies and amendments, destruction records including destruction resolutions and authorizations from Idaho State Archivist, are permanent.
- **Resolutions:** Resolutions passed or considered by the board.
  - Permanent:** Adopted resolutions are permanent. Proposed resolutions are permanent and are retained with the board packet for the meeting at which they were proposed.
- **Technical Manuals, Specifications and Warranties:** Owners manuals and warranties for COMPASS-owned vehicles and equipment. Includes specifications, operating instructions, safety information, and terms for coverage of repair or replacement of equipment.
  - Semi-permanent:** Keep until vehicle or equipment is removed from service.



- **Telephone Messages:** Includes actual telephone messages and telephone message registers.

**Transitory:** Keep until no longer needed.

- **Vehicle Maintenance and Repair Records:** Document the maintenance and repair history of COMPASS-owned vehicles. Records typically include: description of work completed, parts and supplies used, date of service, date purchased, price, vehicle identification number, make and model, registration, etc.

**Semi-permanent:** Keep until vehicle is removed from service.

## Section B: Accounting, Budget, Finance and Payroll Records

- **Accounts Payable:** Records documenting payment of bills, including reports, invoices, statements, vouchers, purchase orders, payment authorizations, receipt records, canceled checks, etc.

**Semi-permanent:** Keep five years from the end of the fiscal year in which the payment was made.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Accounts Receivable:** Records documenting billing and collection of monies owed to COMPASS by vendors, individuals, organizations, governments, etc. Records include: reports, receipts, invoices, awards, logs, lists, summaries, statements, etc.

**Semi-permanent:** Keep five years from the end of the fiscal year in which the payment was received.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Audit Report:** Documents COMPASS' annual audit, examining compliance with generally accepted accounting principles and methods, the accuracy and legality of transactions and accounts, and compliance with requirements, orders, and regulations pertaining to the financial condition and operation of COMPASS. Information includes: auditor's report and recommendations, single audit information concerning federal grants, and other information.

**Permanent:** Audited financial statements, auditors' reports and opinions, and management letters are permanent.

**Semi-permanent:** Work papers and other supporting documents related to the audit are kept five years from the end of the fiscal year for which the audited financial statements were issued.

- **Bank Transaction Records:** Records documenting the status and transaction activity of COMPASS' bank accounts, including account statements, deposit and withdrawal slips, checks, checkbook stubs and check registers, etc.

**Semi-permanent:** Keep five years after the end of the fiscal year in which the statement is dated and the transactions occurred.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Bankruptcy Notices:** Records documenting notification to COMPASS that certain individuals, organizations or other entities have filed for bankruptcy, and used to determine if the individual, organization or entity owes money to COMPASS and to file notice or claim with the court.

**Semi-permanent:** Keep five years after discharge of debt or last action (whichever is shorter).

- **Capital Asset Records:** Records documenting purchase, improvements, depreciation and disposition of capital assets. Capital assets are defined in COMPASS' Financial Policy, and include items such as buildings, real estate, vehicles, equipment, and other assets with a useful life of more than three years.

**Permanent:** Records related to the acquisition, construction, and disposition of real estate and buildings are permanent.

**Semi-permanent:** Keep records for capital assets other than buildings or real estate, such as vehicles and equipment, five years from the end of the fiscal year in which the asset was disposed.

- **Deduction Authorization Records:** Records documenting employee application and authorization for voluntary payroll deductions, direct bank deposits, and related actions. Payroll deductions are directly deposited or remitted to the authorized financial institution, insurance company, or other agency or vendor.

**Semi-permanent:** Deduction authorization records are integrated into employee personnel files. Personnel files are kept ten years from the employee's termination date.

- **Employee Bond Records:** Records documenting the posting of fidelity, performance or position bonds to guarantee the honest and faithful performance of individual employees or groups of employees.

**Semi-permanent:** Keep five years after expiration.

- **Employee Time Records:** Records documenting hours worked, leave hours accrued, and leave hours taken by employees. Information usually includes: employee name, hours worked, type and number of leave hours taken, total hours, dates and related data.

**Semi-permanent:** Time records are filed by pay date during the year. Time records are retained for five years from the end of the fiscal year in which the pay period occurred.

**Note:** Federal regulations (29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

- **Employee Travel Records:** Training request/authorization forms, reimbursements, and other actions related to employee travel, including expense reports and receipts, vouchers and related documents. Information typically includes: estimated and final cost, destination, method of transportation, travel dates, approval signatures, etc.

**Semi-permanent:** Training request/authorization forms are retained for five years from the end of the fiscal year in which the training/travel occurred.

Expense reports, receipts, reimbursements and related documents are integrated with other accounts payable records. Accounts payable records are retained for five years from the end of the fiscal year in which the transaction occurred.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Federal and State Tax Records:** Records used to report the collection, distribution, deposit, and transmittal of federal and state income taxes as well as OASDI and Medicare taxes. Examples include: the federal miscellaneous income statement (1099), request for taxpayer identification number and certificate (W-9), employers' quarterly federal tax return (941, 941E), and similar federal and state completed forms.

**Semi-permanent:** Employer copies of employee W-2 forms are considered part of employee records. W-2's are filed by employee name and are kept ten years from the employee's termination date.

**Semi-permanent:** All other federal and state tax records are kept five years after fiscal year end.

**Note:** Federal regulations (26 CFR 31.6001-1; 29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

- **Financial Reports:** Reports documenting COMPASS' financial condition and operation, issued on a monthly, quarterly, annual or other basis, including quarterly and year-end financial reports to the Finance Committee. Reports include information on revenues and expenditures in relation to the final budget.

**Permanent:** Keep audited annual financial statements permanently.

**Permanent:** Reports to the Finance Committee are included in the Finance Committee meeting packets. Meeting packets are retained permanently.

**Semi-permanent:** Keep all other reports five years after the end of the fiscal year to which they pertain.

**Note:** Idaho Code 50-907(1)(d) requires fiscal year-end financial reports to be kept permanently.

Idaho Code 50-907(2)(a) provides that other financial reports must be kept at least five years.

- **Garnishment Records:** Records documenting requests and court orders to withhold wages from employee earnings for garnishments, tax levies, support payments, and other reasons.

**Semi-permanent:** Garnishment records are integrated into employee personnel files. Personnel files are kept ten years from the employee's termination date.

**Note:** Federal regulations (29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

- **General Ledgers:** Records documenting the summary of accounts reflecting COMPASS' financial position, showing debit, credit and balance amounts per account, budget, and program.

**Semi-permanent:** General ledgers are retained for five years after the end of the fiscal year in which the transactions occurred.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Gift and Contribution Records:** Records documenting gifts and contributions to COMPASS, including donor and acknowledgment letters, checks, receipts and related records.

**Semi-permanent:** Keep five years from the end of the fiscal year in which the gift or contributions was received, unless a longer retention period is specified by the donor.

- **Grant Records:** Records documenting the application, evaluation, awarding, administration, reporting and status of grants applied for, received, awarded or administered by COMPASS. Records include: applications and proposals, summaries, objectives, activities, budgets, exhibits, award notices, progress reports, contracts, financial reports, and related correspondence and documentation.

**Permanent:** Keep final reports from significant grants permanently.

**Semi-permanent:** Keep grant records for grants received, awarded or administered five years from the end of the fiscal year in which the grant terminated, unless a longer retention period is specified in the grant.

**Semi-permanent:** Keep grant records for unsuccessful applications for grants to be awarded or received for five years from the end of the fiscal year in which the application was completed.

- **Investment Records:** Reports, statements, summaries, correspondence and other records documenting and tracking investments made by COMPASS, including the Local Government Investment Pool.

**Semi-permanent:** Keep five years after the end of the fiscal year in which the statement is dated and the transactions occurred.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Leave Requests:** Applications or requests submitted by employees for use of any type of leave time.

**Semi-permanent:** Leave requests are filed with employee time records. Time records and leave requests are retained for five years from the end of the fiscal year in which the pay period occurred.

- **Leave Balance Reports:** Reports summarizing employees' beginning and ending leave balances, and accrual and use of leave during the year.

**Semi-permanent:** Leave balance reports are retained for five years after the end of the fiscal year to which they pertain.

**Note:** Federal regulations (29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

- **Payroll Administrative Reports:** Reports, studies, and other records designed and used for budget preparation, projections, workload and personnel management, and research and general reference.

**Semi-permanent:** Payroll administrative reports are retained for five years after the end of the fiscal year to which they pertain.

- **Payroll check stubs:** Detail gross pay, deductions and net pay for each employee for each pay.

- **Semi-permanent:** Payroll check stubs are retained for five years after the end of the fiscal year to which they pertain.

- **Payroll Registers:** Registers from COMPASS' accounting/payroll system documenting the earnings, voluntary and required deductions, and withholdings of employees.

**Semi-permanent:** Keep for five years from the end of the fiscal year to which the registers relate.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **PERSI Records:** Records relating to PERSI, including Employer Remittance Forms, invoices, correspondence, financial adjustments, etc.

**Semi-permanent:** Keep five years the end of the fiscal year in which the transactions occurred.

**Semi-permanent:** Individual PERSI records, such as contribution request forms, are considered part of employee records and are kept for ten years from the employee's termination date.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.

- **Purchase Orders:** Requests and purchase orders for goods or services purchased by COMPASS.

**Semi-permanent:** Purchase orders are integrated with other accounts payable records. Accounts payable records are retained for five years from the end of the fiscal year in which the transaction occurred.

- **Receipts:** Copies of receipts, showing the date, payor, amount, purpose, etc.

**Semi-permanent:** Keep five years after the end of the fiscal year in which the transaction occurred.

**Note:** Idaho Code 50-907(2)(a) provides that cash receipts subject to audit must be kept at least two years.

- **Sales and Use Tax Forms:** Used to report and remit sales tax collected and due to the state.

**Semi-permanent:** Keep five years after the end of the fiscal year in which the sales tax obligation was incurred.

- **Subsidiary Ledgers, Journals and Registers:** Records documenting details of accounts payable, accounts receivable, fixed asset, job cost, and payroll transactions that provide supporting documentation for the general ledger.

**Semi-permanent:** Keep all records five years after the end of the fiscal year to which the records pertain.

**Note:** Idaho Code 50-907(2)(a) provides that these records must be kept at least five years.



- **Unemployment Compensation Claim Records:** Records documenting claims submitted by former COMPASS employees for unemployment compensation. Usually includes: claims, notices, reports, and related records. May also include records generated by the appeal of claim determinations.

**Semi-permanent:** Unemployment claims records are integrated into the employee's personnel file and are retained for ten years from the employee's termination date.

- **Unemployment Reports:** Records documenting employee earnings on a quarterly basis. Used to document costs and charges in the event of an unemployment compensation claim.

**Semi-permanent:** Keep unemployment reports for five years after the end of the fiscal year to which the report pertains.

- **Unified Planning Work Program Records:** Records used in preparing and adopting COMPASS' Unified Planning Work Program (UPWP), including revenue projections, instructions, member requests, worksheets, adopted UPWP and revisions, and other information.

**Permanent:** Keep the adopted UPWP and adopted revisions of the UPWP permanently.

**Semi-permanent:** Keep all other records five years after the end of the fiscal year to which the UPWP pertains.

- **Wage and Tax Statements:** Annual statements documenting individual employee earnings and withholdings for state and federal income taxes and social security tax, also known as federal tax form W-2.

**Semi-permanent:** Employer copies of employee W-2 forms are considered part of employee records. W-2's are filed by employee name and are kept ten years from the employee's termination date.

**Note:** Federal regulations (26 CFR 31.6001-1; 29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

- **Withholding Allowance Certificates:** Certificates documenting the exemption status of individual employees (W-4 forms).

**Semi-permanent:** Withholding allowance records are integrated into employee personnel files. Personnel files are kept ten years from the employee's termination date.

**Note:** Federal regulations (26 CFR 31.6001-1; 29 CFR 516.5; and 29 CFR 516.6) require retention of these records for at least four years.

## Section C: Information Technology System Records

- **Computer System Security Records:** Records documenting the security of COMPASS information technology systems, including: employee access requests, passwords, access authorizations, and related documents.

**Transitory:** Keep until superseded.

- **Hardware Inventory:** Records documenting the purchase and specifications of computer hardware components owned by COMPASS, including but not limited to, serial numbers and assigned location.

**Semi-permanent:** Keep records for computer hardware components that meet the definition of a capital asset provided in COMPASS' Financial Policy for five years from the end of the fiscal year in which the component was disposed.

**Temporary:** Keep all other records for computer hardware components until the component is removed from service and disposed.

- **Network Records:** Records documenting COMPASS' network architecture including specifications, diagrams and reports.

**Semi-permanent:** Keep network records for the life of the system, until superseded.

- **Software Inventory:** Records documenting the purchase and specifications of computer software owned and/or installed by COMPASS on COMPASS owned hardware. Records should provide assurance that COMPASS is in compliance with licensure and copyright regulations for all installed software.

**Semi-permanent:** Keep records for computer software that meet the definition of a capital asset provided in COMPASS' Financial Policy for five years from the end of the fiscal year in which the component was disposed.

**Temporary:** Keep all other records for software until the software is removed from service and disposed.

- **User Support Records:** Records documenting troubleshooting and problem-solving assistance provided by information systems providers to users of the systems. Records may include: assistance requests, resolution records, and related documentation.

**Transitory:** Keep for one year from the date of service.

## Section D: Insurance and Risk Management Records

- **Contractor Liability Insurance Verification Records:** Letters or certificates of coverage provided by insurance companies declaring that specific contractors are covered by appropriate liability insurance.

**Semi-permanent:** Certificates of insurance are part of the contract records; contract records are retained for five years from the end of the fiscal year in which the contract expires.

- **Insurance Policy Records:** Records documenting the terms and conditions of insurance policies covering liability, property, group employee health and life, motor vehicle, workers' compensation, etc. Records usually include: policies, endorsements, rate change notices, agent of record, and related documents.

**Semi-permanent:** Keep insurance records five years from the end of the fiscal year in which the policy expires, unless there are claims pending; if there are claims pending, keep insurance records five years from the end of the fiscal year in which the claim is settled.

- **Liability Claims Records:** Records documenting various types of liability claims filed by or against COMPASS. Records often include: reports, photographs, summaries, reviews, notices, audio and videotapes, transcripts of recorded statements, correspondence and related documents.

**Semi-permanent:** Keep five years from the end of the fiscal year in which the claim is settled, closed or dismissed.

- **Vehicle Accident Records:** Records documenting accidents involving COMPASS vehicles, including: name and address of parties involved, date and time, complaint, description of damage, photographs, correspondence, etc.

**Semi-permanent:** If no claim is filed, keep five years from the date of the accident.

**Semi-permanent:** If a claim is filed, keep five years from the end of the fiscal year in which the claim is settled, closed or dismissed.

- **Workers' Compensation Claim Records:** Records documenting individual employee claims of job related injuries or illnesses, but not those describing actual medical conditions. Records may include: claim disposition notices, claim reporting and status forms, injury reports, determination orders, insurance premium data, hearing requests, safety citations, inspection reports, medical status updates and reports, investigation reports, reimbursement and payment records, and related correspondence and documentation.

**Semi-permanent:** Keep five years after the claim is closed or the final action on the claim occurs.

**Note:** Idaho Code 72-601 requires employers to keep records of work-related injuries and illnesses and provides that failure to keep these records is a misdemeanor.

## Section E: Personnel Records

- **Benefits Continuation Records:** Records documenting notice to employees, spouses and dependents informing them of their rights to continue insurance coverage after termination or during disability or family leave and whether coverage was elected or rejected. Continuation may be under COBRA or another provision.

**Semi-permanent:** Benefits continuation notices are integrated with personnel records. Personnel records are retained for ten years following the employee's termination date.

- **Employee Benefits Records:** Records relating to COMPASS' employee benefit information such as: selection of insurance plans, retirement, pension and disability plans, deferred compensation plans, and other benefit information. Records may include, but are not limited to: plan selection and application forms, enrollment records, contribution and deduction summaries, personal data records, authorizations, beneficiary information, year-end leave balance reports, notices of disability payment made, and related documentation.

**Semi-permanent:** Individual benefit records are integrated with personnel records. Personnel records are retained for ten years following the employee's termination date.

**Semi-permanent:** Keep benefits plan selection and plan documentation for five years from expiration of the plan.

**Semi-permanent:** Keep all other benefit information for five years from the end of the fiscal year in which it was created.

**Note:** 29 CFR 1627.3 (Age Discrimination) requires employee benefit plans such as pension and insurance plans to be kept for the full period the plan or system is in effect, and for at least one year after its termination. Payroll, recruitment and selection, personnel, and employee benefits records must also be kept at least one year from the date of the personnel action to which the records relate, with the exception of records required for an enforcement action, which must be kept until the action's final disposition.

Idaho Code 45-610 provides that employment records must be maintained for at least three years after the employee's last date of service.

- **Employee Medical Records:** Records documenting employee's eligibility for reimbursement for medical expenses under a COMPASS benefit plan as well as records that document an individual employee's work-related medical history. These records are not personnel records and are kept in a separate location from employee personnel records as required by the Americans with Disabilities Act.

**Semi-permanent:** Keep records for ten years following the employee's termination date, in a separate location from personnel records.

**Note:** Idaho Code 72-601 requires employers to keep records of work-related injuries and illnesses and provides that failure to keep these records is a misdemeanor. Failure to keep these records is a misdemeanor.

- **Employee Personnel Records:** Document an employee's work history. Records may include, but are not limited to: employment applications, notices of appointment, training and certification records, salary schedules, personnel actions, performance evaluations, awards and other special recognition, letters of recommendation, investigation information, disciplinary action, letters of resignation, home address and telephone, emergency notification forms, grievance and complaint records, and related correspondence and documentation.

**Semi-permanent:** Keep ten years after the employee's termination date.

**Note:** Idaho Code 45-610 provides that employment records must be maintained for at least three years after the employee's last date of service.

- **Employment Eligibility Verification Forms (I-9):** Document to the U.S. Immigration and Naturalization Service that an applicant or employee is eligible to work in the United States.

**Semi-permanent:** Keep ten years following the employee's termination date.

**Note:** Federal regulations (8 CFR 274a.2) require these records be kept three years after the date of hiring or one year after the individual's employment is terminated, whichever is later.

- **Equal Employment Opportunity Records:** Records documenting COMPASS' compliance with the Civil Rights Act of 1964, the Equal Employment Opportunity Act of 1972 and the Americans with Disabilities Act. Records include: plans, policy statements, reports, and related information.

**Permanent:** Keep plans, updates and policy statements permanently.

**Semi-permanent:** Keep records related to the filing of a charge of discrimination or other action until final disposition of the case.

**Semi-permanent:** Keep all other records five years.

**Note:** 29 CFR 1602.14 (Recordkeeping and Reporting Under Title VII and ADA) requires personnel, compensation and benefits records to be kept at least one year from the date of making the record or the personnel action involved, whichever is later, except in the case of involuntarily terminated employees, which must be kept at least one year from the date of termination. When a charge of discrimination or action is filed, records must be kept until final disposition of the case.



- **Position Description, Classification and Compensation Records:** Records documenting the description, classification and compensation of COMPASS employees. Usually includes details of duties and responsibilities of each position, time percentage breakdowns of tasks, skills and abilities needed for each position, and related records documenting the development, modification or redefinition of each job or position. Records may include: reports, position descriptions, position evaluations, salary and benefits studies, job analyses, interview data, selection criteria, authorizations, agreements and related records.

**Semi-permanent:** Keep records related to the filing of a charge of discrimination or other action until final disposition of the case.

**Semi-permanent:** Individual job descriptions are integrated with personnel records. Personnel records are kept for ten years following the employee's termination date.

**Semi-permanent:** All other records are kept for five years from the date they are superseded or become obsolete.

**Note:** 29 CFR 1602.31 (Recordkeeping and Reporting for Civil Rights Act and Americans with Disabilities Act) requires these records be kept at least two years from the date of the making of the record or the personnel action involved, whichever occurs later. Where a charge of discrimination has been filed, or an action brought by the Attorney General against a political jurisdiction under title VII or the ADA, COMPASS is required to preserve all personnel records relevant to the charge/action until final disposition of the charge/action.

29 CFR 1627.3 (Age Discrimination) requires payroll, recruitment and selection, personnel, and employee benefits records to be kept at least one year from the date of the personnel action to which the records relate, with the exception of records required for an enforcement action, which must be kept until the action's final disposition.

- **Recruitment and Selection Records:** Document the recruitment and selection of COMPASS employees. Records may include, but are not limited to: job announcements and descriptions, applicant lists, applications and resumes, position advertisement records, classification specifications, affirmative action records, interview questions, interview and application scoring notes, applicant background investigation information, letters of reference, position authorization forms, and related correspondence and documentation.

**Semi-permanent:** Records related to successful selection are integrated with personnel records. Personnel records are kept for ten years from the employee's termination date.

**Semi-permanent:** Keep records related to the filing of a charge of discrimination or other action until final disposition of the case.

**Semi-permanent:** Keep unsuccessful applications and all other records five years after position filled or recruitment canceled.

**Note:** 29 CFR 1602.14 (Recordkeeping and Reporting Under Title VII and ADA) requires recruitment and selection, personnel, compensation and benefits records to be kept at least one year from the date of making the record or the personnel action involved, whichever is later, except in the case of involuntarily terminated employees, which must be kept at least one year from the date of termination. When a charge of discrimination or action is filed, records must be kept until final disposition of the case.

29 CFR 1602.31 (Recordkeeping and Reporting for Civil Rights Act and Americans with Disabilities Act) requires these records be kept at least two years from the date of the making of the record or the personnel action involved, whichever occurs later. Where a charge of discrimination has been filed, or an action brought by the Attorney General against a political jurisdiction under title VII or the ADA, COMPASS is required to preserve all personnel records relevant to the charge/action until final disposition of the charge/action.

29 CFR 1627.3 (Age Discrimination) requires payroll, recruitment and selection, personnel, and employee benefits records to be kept at least one year from the date of the personnel action to which the records relate, with the exception of records required for an enforcement action, which must be kept until the action's final disposition.

- **Training Records:** Records related to training provided or made available to employees by COMPASS. May include class descriptions, attendance records, and related records.

**Semi-permanent:** Training records are considered part of personnel records. After the fiscal year is closed and audited financial statements for that year are issued, training records are filed by employee name and are kept ten years from the employee's termination date.

## **Part 2: Records Storage and Disposition Method**

COMPASS records may be in paper (hard copy) form and/or in digital form. For those records that exist only in hard copy form, COMPASS will create a digital version of those records. All COMPASS records will exist in digital form, in addition to or instead of hard copy form, as appropriate to the type of record. Retaining records in digital form allows for efficient access to and storage of those records.

COMPASS records are stored on-site at the COMPASS offices. Digital records are backed up and stored to an offsite location daily.

Those records defined as permanent in Part 1 shall be maintained in perpetuity.

Idaho code 50-909 requires that permanent records that exist in paper form be retained in that paper form in perpetuity. COMPASS will create a digital version of its paper permanent records for ease of access. Paper originals of permanent records will be archived, indexed and stored in the most cost efficient manner that reasonably protects those records from damage, theft or loss.

Idaho code 50-909 allows records other than permanent records to be retained in digital form. For those non-permanent records that have not exceeded the retention requirement, COMPASS will create a digital version for ease of storage and access.

COMPASS will create not less than two daily back-ups of its digital records, with one back-up held onsite and one back-up held offsite to reasonably insure the security and safety of those records.

Once a valid digital form of the non-permanent record exists, the hard copy is considered a duplicate record and will be destructed without further review. Destruction of duplicate paper records will be accomplished through a commercial shredding service.

A digital copy of non-permanent, paper records that are on file with COMPASS but have already exceeded the retention requirement will not be created. COMPASS staff will create an inventory of these records for review by the Executive Director. The inventory will include, at a minimum, a description of the record, the date it was created and the approved retention period for that record.

Once the Executive Director approves the inventory of records for destruction, the inventory will be provided to the Idaho State Archivist and the COMPASS Board. After the Archivist and the COMPASS Board approve the inventory of records for destruction, the listed records will be destroyed by a commercial shredding service not less than thirty days from the date of the COMPASS Board's approval.

Non-permanent, digital records that have exceeded the retention requirement will not be retained. COMPASS staff will create an inventory of these digital records for review by the Executive Director. The inventory will include, at a minimum, a description of the record, the date it was created and the approved retention period for that record.

Once the Executive Director approves the inventory of digital records for destruction, the inventory will be provided to the Idaho State Archivist and the COMPASS Board. After the Archivist and the COMPASS Board approve the inventory of digital records for destruction, the listed records will be permanently removed from the COMPASS computer network and back-up systems.

COMPASS may elect to, but is not required to, retain non-permanent digital or paper records for periods longer than the retention periods set forth in this policy if it is in COMPASS' best interest to do so.