RECOMMENDATIONS FOR TRANSFERRING ELECTRONIC PERSONNEL FILES

STATE HUMAN RESOURCES DIVISION, OFFICE OF FINANCIAL MANAGEMENT

HUMAN RESOURCES IMAGING WORKGROUP

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Summary

The Human Resources (HR) Imaging Workgroup recommends state government agencies adopt a standard process and personnel file structure for transferring electronic personnel files securely and efficiently within and between agencies.

Background

Currently, there are no agreed-upon standards for personnel file transfer between agencies with electronic personnel files and agencies with paper personnel files. Until recently, all state agencies maintained employee personnel files as paper files. When an employee would move to another agency, the employee's personnel file would be sent to the new agency. In the last couple years, several state agencies have been imaging personnel files, to store and maintain them electronically.[1] So far, processes for transferring electronic files have developed in an ad hoc manner. This has led to confusion, extra work and security concerns as agencies handling files adapt to the new technologies with multiple processes.

HR managers identified a need for enterprise-wide standards for the file transfer process between electronic and paper file systems. Standards are needed at this early stage of transition to electronic files to avoid a complicated patchwork of inconsistent processes. Clarity and direction are needed to prevent the inadvertent destruction of employee history records and ensure confidential personnel information remains confidential through the transfer process.

Workgroup Process

A cross-agency workgroup was formed to review the issue and develop recommendations. Glen Christopherson, Director of Human Resources at the Department of Social and Health Services, served as the Executive Sponsor. The effort was coordinated by the Employment Security Department (ESD) Human Resource Services Division, led originally by Assistant Commissioner Peggy Zimmerman, who was succeeded by Ron Marshall. Workgroup members included representatives from agency HR offices, including agencies with and without imaging systems, the Secretary of State's office, the Office of the State HR Director and agency information technology imaging experts.

The workgroup identified a need for the following:

- A standard process for transferring electronic personnel files, so receiving agencies can plan and expect to receive files in a consistent way.
- An enterprise-wide standard for personnel file content organization, to minimize rework and improve efficiency when transferring personnel files between agencies.

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[1] Department of Social and Health Services has fully implemented an electronic personnel file system using MODIS. Employment Security Department plans to begin imaging active personnel files within the next year and has already imaged inactive personnel files, payroll files and medical files, using Oracle. The Department of Transportation is in the process of imaging personnel files using Oracle. The departments of Corrections and Labor and Industries are planning to image personnel files within the next couple years.

- Accountability in the file transfer process by ensuring that receiving agencies (1) verify electronic personnel file contents are complete and viewable, and (2) acknowledge file ownership, so sending agencies can confidently remove unneeded electronic files from their imaging systems.
- Clear expectations for imaging personnel files when employees are appointed to another agency in a non-permanent or Washington Management Services (WMS) acting capacity.
- Preserving electronic personnel records in compliance with the state records retention schedule.
- Safeguarding confidential personnel information when transferring electronic personnel files via email or compact disc.

The workgroup aimed to develop standards and guidance that would work for most agencies, most of the time. These recommendations are designed to work for agencies with different imaging systems, agencies with paper files and agencies that want to maintain a combination of paper and electronic files while transitioning to an all-electronic personnel file system. The recommendations are based on best practices from agencies currently using or receiving electronic personnel file systems. Recommendations should be applied so long as they do not contradict applicable Collective Bargaining Agreements.

Recommendations

Standards for state agencies <u>sending</u> electronic personnel files (sending agencies)

1) When exporting and saving personnel file documents for transfer, meet the following standards:

- Review personnel file documents prior to exporting and saving to ensure contents are appropriate to transfer.[2] In particular, agencies should **not** transfer the following types of documents:

  i. Documents that do not belong in personnel files.[3] Examples include:
    - o Doctor's notes
    - o Reasonable accommodation paperwork
    - o Family and Medical Leave (FMLA) paperwork
    - o Payroll records
    - o Position description forms
    - o Leave and overtime forms
    - o Investigation reports for unsubstantiated misconduct
    - o Settlement agreements and associated documentation
    - o Employee requests to remove documents from a personnel file
    - o Layoff files
    - o Grievance files
    - o Legal defense files

  ii. Documents appropriate for a personnel file, but that should be removed to comply with:
    - o Settlement agreements
    - o Collective Bargaining Agreements
    - o Records retention schedules

    Example: If an applicable Collective Bargaining Agreement requires automatic removal of a letter of reprimand after a certain period of time, then the letter of reprimand of may need to be removed to comply.

- Export and save personnel file documents in groups that correspond with the five standard file sections, or "tabs", described in **Standard Personnel File Sections** (Attachment A).

- Save the personnel file contents using **both PDF and TIFF file formats**, so receiving agencies have flexibility to use either or both formats[4].

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[2] Often, the employee responsible for reviewing a personnel file prior to transfer is not the same employee that would be responsible for removing documents based on settlement agreements or Collective Bargaining Agreements. Employees responsible for reviewing files prior to transfer may need to check with other HR employees to determine if documents need to be removed prior to transfer.

[3] Documents listed may need to be retained in other files, such as investigation files, medical files, payroll files, etc.

Save each section, or "tab", of documents as a separate PDF and TIFF. For example, all of the performance documents in the "Performance" section of a file should be exported and saved as a single PDF and as a single TIFF, rather than saving each performance-related document as a separate PDF and TIFF. Once a file is completely exported and saved, there should be **five PDFs** and **five TIFFs** that each correspond to one of the five tab sections of the personnel file.

- The PDFs and TIFFs should be exported and saved to a folder. This folder should be easy to locate. Once all the images (PDFs and TIFFs) are in the folder, they can be "zipped" and password-protected. Specific instructions for password-protecting the files will vary based on the computer operating system used.

- Give the PDFs, TIFFs, and folder easily identifiable names. **Do not include confidential information, such as a Social Security Number, in the file or folder names.** The names of the PDF and TIFF files should indicate their corresponding personnel file sections. For example, one name for the performance section of John Doe's personnel file (personnel ID #1234567) exported on Dec. 6, 2012, could be "Doe-1234567-Performance-2012-12-06.pdf".

- Either save the zipped file to a compact disc (CD) for mailing or send it by email attachment to the receiving agency.

- **Do not include the password with the CD or in the email.** Communicate the password to the receiving agency using a different method than the method used to send the file contents. For example, if you email a personnel file, call by phone with the password. Using a different method for file and password adds an additional level of security.

  Make sure to communicate to the receiving agency the method used for password-protecting the files, and **provide them with instructions for how to unlock the files.** Check with your Information Technology office or support staff to determine your agency-specific process and for assistance in drafting instructions for the receiving agency.

- **Why it is necessary to call and verify receipt of the email.** If sending the file by email, call the receiving agency to verify that they received the email. Email systems have size limits for outgoing and incoming emails. These size limits vary by agency. You will receive a warning if the email exceeds your agency's outgoing email size limit, but you will not receive a warning or "bounced-back" message if the email exceeds the receiving agency's incoming email size limit. The receiving agency also will not know if the email you sent exceeded their agency's incoming email size limit.

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[4] TIFF file format is recommended for both shorter- and longer-term records, while PDF file format is recommended only for shorter-term records. See the Office of Secretary of State's Requirements for the Destruction of Non-Archival Paper Records after Imaging for additional information.

- Agencies that also have secure email standards should ensure that any files transferred via email meet those standards as well.[5]

- Delete the folder used to transfer the file once the file has been saved to CD or sent via email to the receiving agency. **(Do not delete the electronic personnel file from your imaging system at this point.)**

- Keep a log of the electronic files sent and the passwords. This log should include, at a minimum: 1) the employee's personnel number, 2) the employee's last and first name, 3) the date the file was sent, 4) the password for unlocking the file, and 5) the name of the receiving agency.

- Agencies should develop agency-specific procedures for exporting and saving personnel files based on the imaging system in use. See ESD's **Sending Personnel Images Securely** (Attachment B) for an example of agency-specific guidance.

2) Along with the electronic personnel file, send the following documents:
   - [Employee Personnel Records Transmittal](#) – This form is required as part of the personnel file transmittal package by the state Human Resource Director in accordance with [WAC 357-22-025](#).

   - **Electronic Personnel File Receipt Verification** (Attachment C) – This form ensures that receiving agencies have verified that electronic personnel file contents are complete and viewable. It also acknowledges file ownership so the sending agency can remove transferred electronic files from its imaging systems with confidence.

3) If the employee's training records are stored in the Learning Management System (LMS), the LMS training records do not need to be transferred. Receiving agencies can retrieve the training records directly from that system, as needed. However, training records created prior to the use of LMS not accessible from LMS **should** be transferred.

4) If also transferring an imaged payroll file, send the payroll file documents on a separate CD or in a zip file that is emailed separately to accommodate agencies with separate payroll and human resource offices and help protect confidential employee information. **Only personnel and payroll files should be sent to the receiving agency; other file types should not be sent.**[6] Agencies sending payroll files electronically may want to develop similar standards for file transfers, and should refer to the records retention schedule to determine which payroll documents to send.[7]

5) Once the sending agency has received the completed Electronic Personnel File Receipt Verification form from the receiving agency, the sending agency should delete the electronic personnel file from their imaging

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[5] Check with your Information Technology office or support staff for information on whether your agency has secure email standards and, if so, how to incorporate those standards into your process.
[6] Other file types that may be maintained by HR include payroll, medical, I-9, workers' compensation, reasonable accommodation, FMLA, position, recruitment, investigation, discipline, grievance, layoff and legal defense files.
[7] See the [State General Government Records Retention Schedule - Version 5.1 (August 2011)](#) for additional information.

system. This will protect the sending agency from public disclosure obligation for transferred personnel file records of employees no longer employed by the sending agency. It will also ensure that there is only one personnel file per employee. **The sending agency should retain the completed Electronic Personnel File Receipt Verification in its imaging system, indexed to the employee's personnel identification number.**

6) Agencies should ensure that the appropriate staff are aware of and follow these standards and any additional agency-specific procedures.

Standards for state agencies <u>receiving</u> imaged personnel files (receiving agencies)

1) Once an electronic personnel file is received, appropriate staff should promptly complete and return the Electronic Personnel File Receipt Verification to the sending agency. This step includes verifying that the electronic file is complete and its contents are viewable, plus acknowledging ownership of the file so the sending agency can remove transferred electronic files from its imaging systems.

2) Appropriate staff must promptly either print or electronically save the personnel file:

   a) **Agencies with electronic personnel files** should promptly upload the imaged personnel file contents to their agency's imaging system. If necessary, refer to the "Recommended Personnel File Sections" attached document to reorganize content. For optimal retention, files should be saved as TIFF files.[8]

   b) **Agencies using paper personnel files** should promptly print out the imaged personnel file contents. If necessary, refer to the "Recommended Personnel File Sections" attached document to reorganize content.

   c) **Agencies using both paper and electronic personnel files** while transitioning to electronic personnel files have two options:

   i) Print out the contents of the electronic personnel file to create a paper file for the employee. When your agency is ready to implement electronic personnel files, scan and upload the paper personnel file contents to your imaging system.
   - **Pros:** Only one set of personnel files (paper) to maintain until ready to implement electronic personnel files.
   - **Cons:** Requires printing out electronic files, which uses paper and staff time at the printing stage, and more staff time when you re-image the records later. Also, printing out imaged records, and then re-imaging them later, can lead to the degradation of image quality over time.

   ii) Upload the electronic personnel file contents to an imaging system or network shared drive. Maintain a paper file for any new actions that occur. The employee's personnel file, in this case, is **split**: part electronic and part paper. When your agency is ready to implement electronic personnel files, scan and upload the paper records and add them to the existing electronic records.
   - **Pros:** Minimizes rework by the receiving agency that would occur when the agency would re-image the records at a later date. Also, it helps prevent the degradation of image quality that can occur when a document is imaged, printed, and re-imaged.
   - **Cons:** Requires two business processes to maintain split electronic and paper files during the transition. There is also a risk that HR staff or others would treat a partial split file (electronic or paper portion) as the complete file when responding to file records requests.[9]

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[8] See the Office of the Secretary of State's <u>Requirements for the Destruction of Non-Archival Paper Records After Imaging</u> for additional information on file formats and records retention.

[9] Agencies can minimize this risk if their employees who respond to personnel file requests treat the *split* file as a single, complete file. This can be done by keeping easily visible notes in both the electronic and paper portions of the file; each note should refer to the other portion of the split file and its location.

Other general recommendations

Standard Personnel File Structure

All agencies must organize new personnel files into the sections described in the Standard Personnel File Sections document, unless required by Collective Bargaining Agreement to follow a different structure. Organizing personnel file content in a consistent way across the state enterprise will make it easier to transfer files, regardless of whether they are paper or electronic. It will minimize the rework that occurs when agencies receive files and must reorganize them to fit their agency-specific file structures. **Agencies are not expected to reorganize existing paper files, as this could entail significant time and resources.**

Records Retention and Archival Quality

The Office of the Secretary of State publishes the State Government General Records Retention Schedule, as well as agency-specific schedules. It has also issued standards and recommendations for imaging records. Agencies that use or are transitioning to electronic personnel file systems should refer to the following guidelines:

Imaging guidance

- [Requirements for the Destruction of Non-Archival Paper Records After Imaging](#) – Guidance on file formats, how to ensure quality scanned records, and when it is safe to destroy paper records.
- [What Happened to the Electronic Imaging System/Documents After Digitization Approval Process?](#) – Explains the Secretary of State's new checklist process for agencies that want to image records.
- [What to do with Archival Paper Records After Imaging?](#) – Clarifies that agencies should not destroy archival records after scanning.

Records retention guidance10

Agencies should comply with their agency-specific records retention schedules and the [State General Government Record Retention Schedule - Version 5.1 (August 2011)](#).

Sending Copies of Electronic Personnel Files to Other Parties

There are times when an agency must provide a copy of an employee's personnel file to parties other than another state agency. In these instances, we recommend the following:

- **Parties within your agency:** There are instances when an individual within your agency will request a partial or whole personnel file. This includes requests by employees, supervisors, managers and support staff. Respond to these requests according to your agency's policies, procedures, and/or applicable Collective Bargaining Agreements to ensure you and your employees:
    1. Grant access to authorized individuals only.
    2. Provide only appropriate records to those authorized individuals to fulfill the request.
    3. Follow any additional applicable processes.

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[10] A separate effort is underway to review and update the records retention schedule for personnel documents, but updates are not expected to be ready prior to the release of these recommendations.

When responding to internal requests in particular, follow the standards for:

- o Reviewing file contents
- o Saving documents
- o Password protecting the file
- o Transferring the whole or partial file via email or CD
- o Verifying receipt with the individual making the request

NOTE: For internal requests, the Employee Personnel Records Transmittal form and the Electronic Personnel File Receipt Verification form do not apply.

- **Parties outside of state government:** This can include lawyers, union representatives, and public records requesters. In these cases, different laws and contract language apply. Follow your agency's policies, procedures and/or applicable Collective Bargaining Agreements to ensure you and your employees:
    1. Grant access to authorized individuals only.
    2. Provide only appropriate records to those authorized individuals to fulfill the request.
    3. Follow any additional applicable processes.

If necessary, consult your public records officer, risk manager, Assistant Attorney General, and/or Labor Relations Division contact about what the party is requesting and what they legally are entitled to receive.

When responding to requests from parties outside of state government, follow the standards for responding to internal requests (see above section).

NOTE: For these external requests, the Employee Personnel Records Transmittal form and the Electronic Personnel File Receipt Verification form do not apply.

In-Person Viewing of Electronic Personnel Files
Agencies with electronic personnel files who want to accommodate in-person viewing of these files should ensure that people viewing the files cannot alter records in the electronic personnel files, or access private personal information. If possible, prepare these files in "read only" mode and remove access to file metadata.

Procedure for Imaging Personnel Files for Non-Permanent or WMS Acting Employees
When an existing employee leaves an agency for a non-permanent or WMS acting appointment at another agency, follow the procedure below for the transfer of personnel files.

Scenario 1: Non-Permanent/Acting Appointment

- Agency A's employee is appointed to Agency B non-permanently or in an acting WMS appointment.
- Agency A maintains paper personnel files.
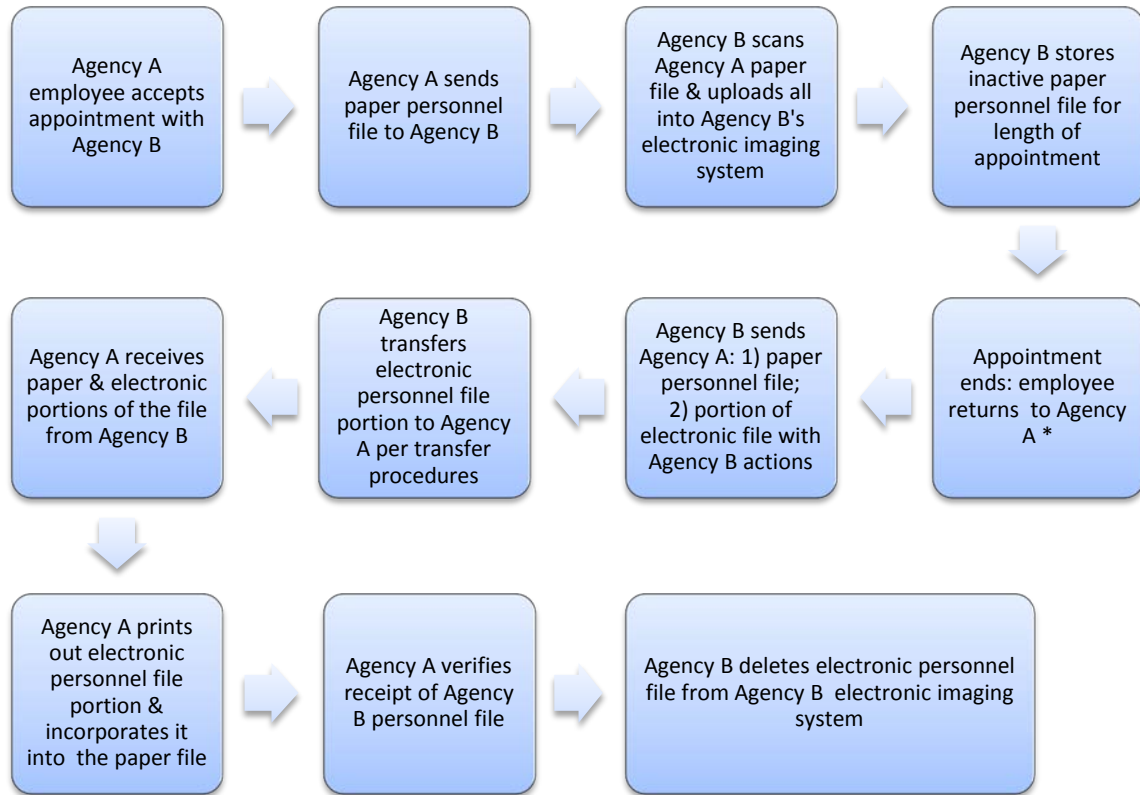- Agency B maintains electronic personnel files.

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┌─────────────────┐     ┌─────────────────┐     ┌─────────────────┐     ┌─────────────────┐
│ Agency A        │     │ Agency A sends  │     │ Agency B scans  │     │ Agency B stores │
│ employee accepts│ ──▶ │ paper personnel │ ──▶ │ Agency A paper  │ ──▶ │ inactive paper  │
│ appointment with│     │ file to Agency B│     │ file & uploads  │     │ personnel file  │
│ Agency B        │     │                 │     │ all into Agency │     │ for length of   │
│                 │     │                 │     │ B's electronic  │     │ appointment     │
│                 │     │                 │     │ imaging system  │     │                 │
└─────────────────┘     └─────────────────┘     └─────────────────┘     └─────────────────┘
                                                                                 │
                                                                                 ▼
┌─────────────────┐     ┌─────────────────┐     ┌─────────────────┐     ┌─────────────────┐
│ Agency A receives│    │ Agency B        │     │ Agency B sends  │     │ Appointment     │
│ paper & electronic│ ◀─│ transfers       │ ◀── │ Agency A: 1)    │ ◀── │ ends: employee  │
│ portions of the  │    │ electronic      │     │ paper personnel │     │ returns to      │
│ file from Agency B│   │ personnel file  │     │ file; 2) portion│     │ Agency A *      │
│                  │    │ portion to      │     │ of electronic   │     │                 │
│                  │    │ Agency A per    │     │ file with Agency│     │                 │
│                  │    │ transfer        │     │ B actions       │     │                 │
│                  │    │ procedures      │     │                 │     │                 │
└─────────────────┘     └─────────────────┘     └─────────────────┘     └─────────────────┘
         │
         ▼
┌─────────────────┐     ┌─────────────────┐     ┌─────────────────────────────┐
│ Agency A prints │     │ Agency A verifies│    │ Agency B deletes electronic │
│ out electronic  │ ──▶ │ receipt of Agency│ ──▶│ personnel file from Agency B│
│ personnel file  │     │ B personnel file │    │ electronic imaging system   │
│ portion &       │     │                  │    │                             │
│ incorporates it │     │                  │    │                             │
│ into the paper  │     │                  │    │                             │
│ file            │     │                  │    │                             │
└─────────────────┘     └─────────────────┘     └─────────────────────────────┘
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Figure 1. Sending personnel files for non-permanent or WMS acting appointments

*If the employee stays with Agency B permanently, then Agency B can destroy the paper file in storage.

We recommend this process to ensure:

1. Agency A's paper personnel file is not destroyed upon transfer to Agency B.
2. The paper personnel file is stored and inactive while the employee is with Agency B.
3. When the employee returns to Agency A, both the inactive paper file and electronic personnel file records are sent back and incorporated into one file.

Scenario 2: On Loan Assignment

Agency A's employee is on an "on loan" assignment to Agency B. This action is not keyed in HRMS and the employee is still officially the employee of Agency A. Agency A does **not** send the employee's personnel file to Agency B because Agency B is not the employer. Any personnel actions completed on the employee during the on loan period would be processed by Agency A and records maintained in Agency A's personnel file for the employee. [11]

- Employee works at Agency A, but is on an "on loan" assignment to Agency B.
- Agency A (sending agency) keeps **paper** personnel files.
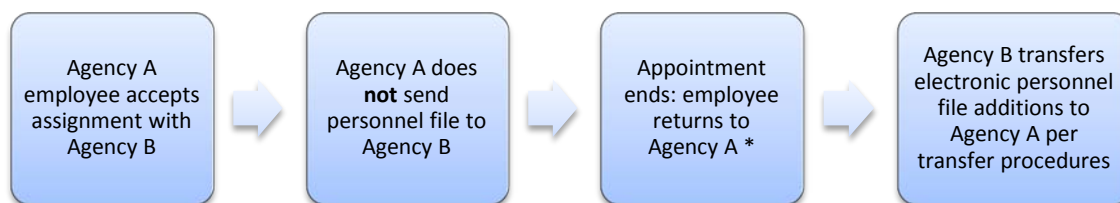- Agency B (receiving agency) keeps **imaged** personnel files.

Agency A employee accepts assignment with Agency B		Agency A does **not** send personnel file to Agency B		Appointment ends: employee returns to Agency A *		Agency B transfers electronic personnel file additions to Agency A per transfer procedures

Figure 2. Do not send original personnel file for on-loan appointments

Best Practices and Lessons Learned for Implementing Electronic Personnel Files

Agencies that are considering implementing electronic personnel files can learn from industry best practices and from the experiences of agencies that have already completed the process. For additional information on what to consider, see **Imaging Records – Where Do You Start?** (Attachment D).

Inactive Personnel Files/"Off Payroll" Files

When an employee leaves state service and their personnel file was maintained electronically, that file should be retained in the agency's imaging system in accordance with records retention requirements. If that employee is rehired later by another agency, that other agency will need to contact the original agency to obtain a copy of the personnel file records.

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[11] For other arrangements that do not fit this description, the sending and receiving agencies should work together to reach a common agreement on how to maintain the employee's personnel file.

Recognition

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List of Attachments

- Attachment A – Standard Personnel File Sections
- Attachment B – Sending Personnel Images Securely
- Attachment C – Electronic Personnel File Receipt Verification
- Attachment D – Imaging Records – Where Do You Start?