

# Managing the Dental Team

## ADA's Guidelines for Practice Success™ (GPS™)

### **CHECKLIST: CONFIDENTIALITY AND RETENTION SCHEDULE FOR PERSONNEL RECORDS**

#### Employees' General Personnel Files

- Employee information (name, address, occupation, hire date, emergency contact)
- Application/resume and interview notes
- Offer letter and/or employment agreements
- Job description with signed acknowledgment
- Signed acknowledgments of receipt for employee handbook, confidentiality policy, ADRP, and any policy updates or notices
- Copies of licenses/certifications
- Training completion/attendance records
- Performance evaluation records
- Corrective action notices and notes of verbal warnings
- Promotions/transfers/demotions/selection for training
- Paycheck deduction authorizations
- Attendance records/time off requests
- Overtime requests/authorizations

#### Separate Confidential Employee Files

It is generally recommended that the following records be maintained separately from the general personnel file. This practice may be helpful if it's ever necessary to dispute a discrimination claim and/or prove efforts to maintain the employee confidentiality.

- Workers' compensation records
- Disability accommodation requests
- I-9 form with any copies of identification records, including a photo ID (alternatively, you may wish to keep all of your employees' I-9 forms together in a single confidential file)
- Documentation indicating age, disability, race, pregnancy/maternity, including requests for leaves of absence, accommodation, time off for religious holidays, etc.
- Records containing employee's medical information
- Group health enrollment and claim forms
- Garnishment paperwork
- W-4 form, direct deposit authorization, other records containing social security numbers or other protected information
- Drug test reports
- Investigation documents, including interview notes and legal recommendations
- Background check reports

#### Wage and Hour Records (usually kept separate from personnel records)

- Hours worked for non-exempt employees (e.g., time cards)
- Back-up records for hours worked (e.g., schedules)
- Regular hourly pay rate
- Overtime paid
- Total wages paid for each pay period
- Date of wage payment and pay period covered
- Deductions from compensation
- Bonuses paid
- Date of birth for employees under 19 years old
- W-2's

#### Other Required Records Related to Human Resources

- OSHA injury logs
- Records of employees' exposure to toxic substances
- Resumes/applications/test results for rejected applicants
- Job ads
- HIPAA training records

#### Records of Terminated Employees

- Retain regular files for at least three (3) years (or longer if required by state law)
- Separation from employment letter
- COBRA or state equivalent notice and election forms
- Unemployment claims
- Updated home address for end of year tax purposes

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