

COB - BOSAIR FORM

11/05/2025 2:50 PM (MST)

Submitted by Autumn.OConnor@pima.gov (Autumn.Oconnor@pima.gov)



BOARD OF SUPERVISORS AGENDA ITEM REPORT (BOSAIR)

All fields are required. Enter N/A if not applicable. For number fields, enter 0 if not applicable.

Award Type: Agenda Item

Is a Board Meeting Date Requested? Yes

Requested Board Meeting Date: 12/02/2025

Project Title / Description: Proposed Revisions to Personnel Policy 8-118, Personnel Records

Agenda Item Report

Introduction / Background: Proposed Revisions to Personnel Policy 8-118, Personnel Records

Discussion: The proposed updates modernize and clarify the County's procedures for maintaining employee records in an electronic format, ensure compliance with state and federal privacy laws, and align terminology and structure with other County policies. The revisions also provide clearer definitions and add new sections on medical and occupational health.

See Summary of Changes attached.

Conclusion: This item recommends Board of Supervisors approval of revisions to Personnel Policy 8-118, Personnel Records.

Recommendation: That the Board of Supervisors approve Personnel Policy 8-118, Personnel Records modifications as outlined, to become effective upon approval.

Fiscal Impact: None

Support of Prosperity Initiative: N/A

Provide information that explains how this activity supports the selected Prosperity Initiative N/A

Board of Supervisor District:

- 1
- 2
- 3
- 4
- 5

Department: Human Resources

Name: Autumn O'Connor

Telephone: 520-724-8672

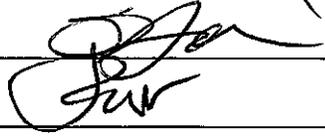
Department Director Signature: _____



Date: _____

11/5/25

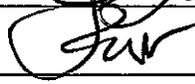
Deputy County Administrator Signature: _____



Date: _____

11-5-2025

County Administrator Signature: _____



Date: _____

11/6/2025



SUMMARY OF CHANGES

Significant Changes:

Throughout Document Updated Appointing Authority to Department Director or Elected Official (or designee) to remain consistent with other policies.

Changed language to gender neutral.

Definitions

(A) Arranged definitions in alphabetical order. Added new definitions for Custodian of Records, Official Personnel File, and Individually Identifiable Health Information (IIHI).

General

(B)(1) Added language that Human Resources Department maintains official personnel files, these are the property of the County, and how the files are retained.

Official Personnel Files

(C)(1) Added language identifying that the files are electronic.

(C)(2) Clarified that the file contains all personnel-related information on a County employee in lieu of a list of identified items (A-O).

Official Benefits Files (formerly Official Insurance Files)

(D)(1) Clarified that the files are kept electronically.

(D)(3) Added that the County abides by all State and Federal privacy laws to maintain the health information, including the requirement to issue Notices.

Form I-9 Employment Eligibility Verification Archive Files

(E) Added language that documents are retained in separate files.

(E)1 Added the Employment Eligibility Verification Form

(E)(2) Changed the requirement for retaining supporting documents to retaining electronic images of the supporting documents.

Official Payroll Files

(F)(1) Added language that documents are retained in a separate file, in an electronic format. Identified the documents that Payroll retains.



Medical Files

(G) Add a new section for Medical Files and what they contain.

Occupational Health Files

(H) Added a new Section for Occupational Health Files and what they contain.

Department File (Previously Section G)

- (I)(1) Identified what can be contained in department personnel files in lieu of a list of identified items (A-L).
- (I)(2) Added language that the document may be electronic in nature.
- (I)(3) Identified the medical documents that are permissible to be held in department personnel files.
- (I)(4) Added language to note that the files may be electronic. Transferring department no longer to retain information on prior employees.
- (I)(5) Removed this section.

Access to Personnel Files (Previously Section H)

- (J)(1)(h) Added language for a hiring department to view an official personnel file.
- (J)(7) Added a reference to Administrative Procedure 23-16 III (A)(2).

A. Definitions

1. "Access" means to have authorization to view, examine, copy, obtain information from, or add to personnel files as defined in this policy.
2. "Custodian of Records" means the person(s) designated by the County Administrator to be in charge of official employee records. For the purpose of inquiries and/or subpoenas, the Director of Human Resources is designated the custodian of personnel records and the Director of Finance and Risk Management is designated the Custodian of financial records.
3. "Maintain" means collect, file, update, use, or disseminate.
4. "Official Benefits File" means insurance and benefits information maintained on current County employees.
5. "Official Personnel File" means any employment information maintained on current or former County Employees.
6. "Official Payroll File" means any payroll information maintained on current County employees.
7. "Individually Identifiable Health Information" (IIHI) is medical demographic, or payment information that identifies or could be used to identify the individual to whom it belongs. This can include:
 1. Information created or received by a healthcare provider, health plan, employer, or Healthcare Clearinghouse;
 2. Information about the individual's past, present or future physical or mental health or condition;
 3. Details about the provision of healthcare to the individual, or
 4. Any payments for the provision of healthcare to the individual.
8. "Record" means any information maintained on an individual with their name and/or other identification.

B. General

1. Pima County Human Resources Department maintains official personnel files for each employee upon hire. These files are kept in an electronic format, are the property of the County, and are kept in compliance with applicable records retention schedules.
2. Effective personnel administration requires the gathering and use of information concerning employees. Personnel files shall be established

and maintained in a manner designed to protect the privacy of all concerned.

3. Each Department Director or Elected Official is responsible for ensuring that employment information is filed in the appropriate personnel file.
4. To avoid inappropriate disclosure of records pertaining to County employees, all inquiries for personnel information shall be referred to the Custodian of personnel records and all inquiries for payroll information shall be referred to the Custodian of financial records. Departments shall instruct all employees that inquiries regarding current and former employees, made either verbally or in writing, are to be referred to the appropriate Custodian of records. This Policy shall be adhered to regardless of how routine or insignificant the inquiry may be.

C. Official Personnel Files

1. Official personnel files shall be maintained by Human Resources and are the property of Pima County Government. Official personnel files are electronic in format and maintained as such.
2. Each official personnel file contains all personnel-related information for every County Employee in accordance with all applicable laws, to include, but not limited to, job applications, onboarding forms, Loyalty Oaths, performance evaluations, disciplinary actions, grievances, letters of job-related recognition, training records, documents related to licenses and certifications and formal commendations.

D. Official Benefits Files

Official benefits files are electronic and maintained by Human Resources in a separate file, and contain:

1. Medical and Dental membership records;
2. Life insurance membership records; and
3. Other supplemental benefit records. To the extent that the file contains IIHI, the County abides by all State and Federal privacy laws to maintain the privacy of that health information. The County will provide the employee with a Notice as to the legal duties and privacy practices with respect to health information the County collects and maintains, and abides by the terms of that Notice, subject to specific reservation of rights listed on the Notice.

E. Form I-9 Employment Eligibility Verification Archive Files

Official Form I-9 archive files are maintained by Human Resources in a separate file and contain the following information:

1. Form I-9 (Employment Eligibility Verification Form); and
2. Electronic images of required supporting documentation as identified by U.S. Citizenship and Immigration Services.

F. Official Payroll Files

1. Official payroll files are maintained by the Finance and Risk Management Department in a separate file and in electronic format to include tax elections and authorizations for deductions contain:
2. The Finance and Risk Management Department shall respond to civil subpoenas for any payroll records in the same manner outlined in J(5) below.

G. Medical Files

Medical files, to include IIHI, are maintained by Human Resources in a separate file and contain all Family and Medical Leave Act (FMLA), Americans with Disabilities (ADA), and short-term disability paperwork, and supporting documentation. This information is not disclosed, except as required by law.

H. Occupational Health Files

Occupational Health files are maintained by Human Resources in a separate file and contain pre-employment and renewal physicals, commercial driver's license information, vaccination records, industrial hygiene surveillance records, Special Medical Evaluation records, lab results, drug and alcohol testing results, and Substance Abuse Provider recommendations. This information is not disclosed except as required by law.

I. Department Files

1. Department personnel files should be limited in scope and defer to the Official Personnel file to avoid duplication. Items should only be retained that are necessary for the department's functioning, such as telecommuting agreements, outside employment approvals, informal and formal discipline, and employee evaluations.
2. Hard copy files are not required. Electronic documents and/or Workday

documents can be retained in their native format and/or location.

3. Department files must not contain any medical documents containing a medical diagnosis or treatment. They may include initial reports of an industrial accident/injury completed by the employee or supervisor and/or employee work restrictions.
4. Upon request, departments shall provide an opportunity for employees to review their department personnel file.
5. Department files shall be relocated to the receiving department when an employee transfers. The files may be electronic files.

J. Access to Personnel Files

1. Official Personnel files shall not be disclosed except as required by law. The following persons may be allowed access to Official Personnel files:
 - a. Members of the Board of Supervisors;
 - b. The County Administrator or designee;
 - c. The employee or the employee's designated representative who has written authorization from the employee;
 - d. Authorized County staff with the approval of the Director of Human Resources or designee;
 - e. Law enforcement and investigative organizations' staff in the course of their duty, when required, and only after presentation of proper identification and a release signed by the employee, or a subpoena calling for release of the records;
 - f. Internal, state and federal auditors in the course of their duty, when required, and only after presentation of proper identification and notification of the audit;
 - g. The employee's Department Director or Elected Official;
 - h. A hiring Department Director or Elected Official for which an employee is applying for a position.
2. The Director of Human Resources may provide access to persons other than those cited in this Policy upon determination that such persons in the course of their official duties have a valid need-to-know.

3. Department personnel files shall not be disclosed except as required by law. The following persons may be allowed access:
 - a. The County Administrator or designee;
 - b. The employee or the employee's designated representative, who has written authorization from the employee;
 - c. The Department Director or Elected Official and authorized departmental staff;
 - d. Law enforcement and investigative organizations' staff in the course of their duty, when required, and only after presentation of proper identification and a release signed by the employee, or a subpoena calling for release of the records.
4. Department Director or Elected Official and/or the Director of Human Resources shall require reasonable identification of individuals requesting information to ensure that records are disclosed only to the proper persons.
5. Human Resources shall respond to civil subpoenas for any personnel records as follows:
 - a. Notify the affected employee;
 - b. Determine whether to seek, through the County Attorney, a protective order restricting dissemination to only such materials as are necessary and proper; and
 - c. Comply with the subpoena as required by law.
6. Each employee and/or their authorized representative has the right to review the employee's personnel files. With reasonable notice given to Human Resources, files may be reviewed at Human Resources in the presence of authorized staff.
7. Employees shall be provided with copies of their own personnel records for a fee not to exceed the actual cost of providing the copy, or the prescribed statutory fee, if any, whichever is less. (See Administrative Procedure 23-16 III(A)(2).)

A. Definitions

1. "Access" means to have authorization to permission, liberty, or ability to view, examine, copy, obtain information from, or add to personnel files as defined in this policy. ~~"Record" means any information maintained on an individual with his/her name and/or other identification.~~
2. "Custodian of Records" means the person(s) designated by the County Administrator to be in charge of official employee records. For the purpose of inquiries and/or subpoenas, the Director of Human Resources is designated the custodian of personnel records and the Director of Finance and Risk Management is designated the Custodian of financial records. ~~"Official Personnel file" means any employment information maintained on current or former County Employees.~~
3. "Maintain" means collect, file, update, use, or disseminate.
4. ~~"Access" means to have permission, liberty, or ability to examine, obtain information from, or add to personnel files as defined in this policy.~~
5. ~~"Official insurance Benefits File" means insurance and benefits information maintained on current County employees.~~
5. "Official Personnel File" means any employment information maintained on current or former County Employees.
6. "Official Payroll file" means any payroll information maintained on current County employees.
7. ~~"Custodian of Records" means the person(s) designated by the County Administrator to be in charge of official employee records. For the purpose of inquiries and/or subpoenas, the Director of Human Resources is designated the custodian of personnel records and the Director of Finance and Risk Management is designated the Custodian of financial records.~~
7. "Individually Identifiable Health Information" (IIHI) is medical demographic, or payment information that identifies or could be used to identify the individual to whom it belongs. This can include:
 1. Information created or received by a healthcare provider, health plan, employer, or Healthcare Clearinghouse;
 2. Information about the individual's past, present or future physical or mental health or condition;
 3. Details about the provision of healthcare to the individual, or
 4. Any payments for the provision of healthcare to the individual.

84. "Record" means any information maintained on an individual with ~~his/her~~their name and/or other identification.

B. General

~~1.~~ 4. ~~—~~ Pima County Human Resources Department maintains official personnel files for each employee upon hire. These files are kept in an electronic format, are the property of the County, and are kept in compliance with applicable records retention schedules.

~~1.2.~~ Effective personnel administration requires the gathering and use of information concerning employees. Personnel files shall be established and maintained in a manner designed to protect the privacy of all concerned.

32. Each ~~Appointing Authority~~ Department Director or Elected Official is responsible for ensuring that employment information is filed in the appropriate personnel file.

43. To avoid inappropriate disclosure of records pertaining to County employees, all inquiries for personnel information shall be referred to the Custodian of personnel records and all inquiries for payroll information shall be referred to the Custodian of financial records. Departments shall instruct all employees that inquiries regarding current and former employees, made either verbally or in writing, are to be referred to the appropriate Custodian of records. This Policy shall be adhered to regardless of how routine or insignificant the inquiry may be.

C. Official Personnel Files

1. Official personnel files shall be maintained by Human Resources and are the property of Pima County Government. Official personnel files are electronic in format and maintained as such.

2. Each official personnel file ~~should~~ contains all personnel-related information for every County Employee in accordance with all applicable laws, to include, but not limited to documentation of official personnel actions and may include but is not limited to, job applications, onboarding forms, Loyalty Oaths, performance evaluations, disciplinary actions, grievances, letters of job-related recognition, training records, documents related to licenses and certifications and formal commendations. ~~the following information:~~

~~a.~~ — Employee's name;

- ~~b. Social Security Number;~~
- ~~c. Employee emergency information;~~
- ~~d. Employment application(s) prior to July 25, 2014;~~
- ~~e. County Personnel Action Forms and supporting documentation;~~
- ~~f. Loyalty Oath;~~
- ~~g. Performance Appraisal Forms;~~
- ~~h. Documentation of all formal disciplinary actions and grievance actions not alleging discrimination when the grievance was filed based on a Letter of Reprimand, only if the grievance is denied;~~
- ~~i. Relevant credentials and/or verification of transcripts or diplomas as stated on the application prior to July 25, 2014;~~
- ~~j. A copy of the Pima County Drug Free Workplace Agreement signed by the employee;~~
- ~~k. Electronic Mail Procedure Acknowledgment prior to January 25, 2008;~~
- ~~l. Preventing Workplace Harassment Acknowledgment;~~
- ~~m. Employee Consent to Pima County's Disclosure of Employment Information and Release of Liability Form prior to July 25, 2014;~~
- ~~n. Applicant Consent to Release Liability and Reference Information Form and accompanying reference check documentation prior to July 25, 2014;~~
- ~~o. Eligibility for Reinstatement of Sick Leave Hours Form.~~

D. Official Insurance Benefits Files

Official insurance benefits files are electronic and maintained by Human Resources in a separate file, and ~~should contain the following information:~~

1. Medical and Dental membership records;
- ~~2. Dental membership records;~~

~~3.2.~~ Life insurance membership records; and

~~4.3.~~ Other supplemental benefit records. To the extent that the file contains IIHI, the County abides by all State and Federal privacy laws to maintain the privacy of that health information. The County will provide the employee with a Notice as to the legal duties and privacy practices with respect to health information the County collects and maintains, and abides by the terms of that Notice, subject to specific reservation of rights listed on the Notice.

E. Form I-9 Employment Eligibility Verification Archive Files

Official Form I-9 archive files are maintained by Human Resources in a separate file and ~~shall~~ contain the following information:

1. Form I-9 (Employment Eligibility Verification Form); and
2. Supporting documentation. Electronic images of required supporting documentation as identified by U.S. Citizenship and Immigration Services.

F. Official Payroll Files

1. Official payroll files are maintained by the Finance and Risk Management Department in a separate file and ~~should in~~ electronic format to include tax elections and authorizations for deductions ~~contain the following documents:~~

~~a. W-4 Forms;~~

~~b. Arizona State Retirement Fixed Benefit Plan Enrollment Form, Application for Return of Contributions Form and/or Change of Beneficiary Designation Form;~~

~~c. Authorizations for deductions;~~

~~d. U.S. Military Selective Service Act Compliance Form.~~

2. The Finance and Risk Management Department shall respond to civil subpoenas for any payroll records in the same manner outlined in H(J)5 below.

G. Medical Files

Medical files, to include IIHI, are maintained by Human Resources in a separate file and contain all Family and Medical Leave Act (FMLA), Americans with Disabilities (ADA), and short-term disability paperwork, and supporting documentation. This information is not disclosed, except as required by law.

H. Occupational Health Files

Occupational Health files are maintained by Human Resources in a separate file and contain pre-employment and renewal physicals, commercial driver's license information, vaccination records, industrial hygiene surveillance records, Special Medical Evaluation records, lab results, drug and alcohol testing results, and Substance Abuse Provider recommendations. This information is not disclosed except as required by law.

I. Department Files

1. 1. Department personnel files should be limited in scope and defer to the Official Personnel file to avoid duplication. Items should only be retained that are necessary for the department's functioning, such as telecommuting agreements, outside employment approvals, informal and formal discipline, and employee evaluations. contain the following information:

4-2. Hard copy files are not required. Electronic documents and/or Workday documents can be retained in their native format and/or location.

- a. Employee's name;
- b. Social Security Number;
- c. Classification title and classification code;
- d. Employee emergency information;
- e. Copies of Personnel Action Forms;
- f. Performance Appraisal and Performance Plan forms;
- g. Documentation of all formal and informal disciplinary and grievance actions;
- h. Letters of commendation;
- i. Educational Reimbursement Application Forms;
- j. Outside Employment Permission forms;

~~k. Computer Use and Electronic Mail Procedure acknowledgments;~~

~~l. Termination arrangements (non-medical) as found in Personnel Policy 8-123.A.6.~~

3.2. Department ~~medical files~~ should ~~not~~ contain any medical documents containing a medical diagnosis or treatment. They may include initial reports of an industrial accident/injury completed by the employee or supervisor and/or employee work restrictions. ~~the following information:~~

~~a. Workers' compensation reports:~~

~~(1) Initial reports (Supervisor's Report of Industrial Accident/Injury; Employer's Report of Industrial Injury);~~

~~(2) Work status documentation from health care provider;~~

~~b. Accident /Injury reports;~~

~~c. Records and documents relating to medical certifications or medical history except for Family and Medical Leave Act (FMLA) related medical documents dated on or after January 16, 2009, including medical certification forms;~~

~~G. 2. d. Hepatitis B Vaccination Consent/Declination Form;~~

~~e. Pima County Risk of Exposure Notification;~~

~~f. Termination arrangements (verification from medical provider) as found in Personnel Policy 8-123.A.6.~~

43. Upon request, departments shall provide an opportunity for employees to review their department personnel files.

54. Department files shall be relocated to the receiving department when an employee transfers. The files may be electronic files. ~~The transferring department may retain the following information:~~

~~a. Employee's name;~~

~~b. Address;~~

~~c. Social Security Number;~~

~~d. History of personnel actions as indicated on County Personnel Action Forms.~~

~~5. Any employee records maintained by the department, aside from those contained in the official department personnel file, shall contain no adverse material that is not contained in the official department personnel file. For the purpose of employee performance management, notations related to deficiencies in identified performance factors may be maintained in a supervisory file provided the performance issue(s) has been discussed with the employee and the notation(s) removed after a disciplinary or non-disciplinary action and/or performance appraisal has been issued.~~

JH. Access to Personnel Files

1. Official ~~p~~ersonnel files shall not be disclosed except as required by law. The following persons may be allowed access to ~~O~~fficial ~~p~~ersonnel files:
 - a. Members of the Board of Supervisors;
 - b. The County Administrator or designee;
 - c. The employee or the employee's designated representative who has written authorization from the employee;
 - d. Authorized County staff with the approval of the Director of Human Resources or designee;
 - e. Law enforcement and investigative organizations' staff in the course of their duty, when required, and only after presentation of proper identification and a release signed by the employee, or a subpoena calling for release of the records;
 - f. Internal, state and federal auditors in the course of their duty, when required, and only after presentation of proper identification and notification of the audit;
 - g. The employee's ~~Appointing Authority or designee~~ Department Director or Elected Official;
 - ~~h. A hiring Department Director or Elected Official for which an employee is applying for a position.~~

2. The Director of Human Resources may provide access to persons other than those cited in this Policy upon determination that such persons in the

course of their official duties have a valid need-to-know.

3. Department personnel files shall not be disclosed except as required by law. The following persons may be allowed access:
 - a. The County Administrator or designee;
 - b. The employee or the employee's designated representative, who has written authorization from the employee;
 - c. The ~~Appointing Authority~~ Department Director or Elected Official and authorized departmental staff;
 - d. Law enforcement and investigative organizations' staff in the course of their duty, when required, and only after presentation of proper identification and a release signed by the employee, or a subpoena calling for release of the records.
4. ~~Appointing Authorities~~ Department Director or Elected Official and/or the Director of Human Resources shall require reasonable identification of individuals requesting information to ensure that records are disclosed only to the proper persons.
5. Human Resources shall respond to civil subpoenas for any personnel records as follows:
 - a. Notify the affected employee;
 - b. Determine whether to seek, through the County Attorney, a protective order restricting dissemination to only such materials as are necessary and proper; and
 - c. Comply with the subpoena as required by law.
- ~~H.~~ 6. Each employee and/or ~~their~~ his/her authorized representative has the right to review the employee's personnel files. With reasonable notice given to Human Resources, files may be reviewed at Human Resources in the presence of authorized staff.
7. Employees shall be provided with copies of their own personnel records for a fee not to exceed the actual cost of providing the copy, or the prescribed statutory fee, if any, whichever is less. (See Administrative Procedure 23-16 III(A)(2).)