



Catholic Diocese of Columbus

900.0 - Employee Files

A file is to be kept for every employee hired by any entity of the Diocese of Columbus, including parishes, schools, agencies and institutions.

The following items apply to each employee file.

901.0 - Confidentiality

902.0 - Files Containing INS Form I-9

903.0 - Annualization Policy

904.0 - State of Ohio New Employee Reporting

905.0 - Other Documentation in Employee Files



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901.0 CONFIDENTIALITY

Access to and Storage of Employee Information

- The contents of employees' files are confidential and are to be accessed only by authorized personnel.
- All employee files are to be kept in a secured storage place.
- An employee has the right to request a copy of any item in their employee file, at any time.

Confidentiality

At times, the Diocese of Columbus and its entities maintain personal and private confidential information about employees and/or those whom we serve.

From time-to-time, an employee of the Diocese of Columbus may gain and have access to certain private confidential information about others.

This information is confidential and private and must be kept that way.

The sharing of this information (either individually or in combination with other sensitive information) could harm the Diocese of Columbus, its entities, its employees, or those whom we serve.

The unauthorized disclosure of sensitive, private, confidential information of the employees or others served is prohibited.

Without proper authorization from the pastor/principal/director, this information cannot be used for any reason, other than uses that occur as part of an employee's regular job duties, or disclosed to anyone outside the Diocese of Columbus or its entities.

Failure to follow this policy may lead to discipline up to and including discharge from employment.



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902.0 - Files Contain Form I-9

This form is also known as an Employee Eligibility Verification form and is required by the Homeland Security, Office of U.S. Citizenship and Immigration Services.

- The I-9 form must be completed for all new employees and retained in the Employee's file.
- Form I-9 requires new employees to present certain documentation within 3 days of their hire date;
- Employees who do not present the appropriate documentation may not continue to be employed.
- Form I-9 is to be signed by the person who has reviewed and approved the submitted documentation.

All employees hired after November 26, 1986 are required to have a properly completed I-9 form in their employee file.

The I-9 must be retained in the employee file until three (3) years after the date of hire or one (1) year after employment ends, whichever is later.

Substantial penalties exist if this form is not present for the prescribed time or is inadequately completed.



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903.0 - Annualization Policy

Under Internal Revenue Code Section 409(A), the Diocese of Columbus has implemented an Annualization Policy effective January 1, 2008.

Under this policy, certain qualified employees may be offered the option to annualize their salary.

Those that may qualify for this election include employees who work less than a full 12 month year and who elect to be paid over a 12 month period.

Those who are typically eligible for this election include teachers and others working in Diocesan elementary and high schools.

Each eligible employee will be given a copy of the Diocesan Annualization policy.

Employees who elect to annualize their pay must sign an Annualization Election form, which is to be retained in their employee file.



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904.0 - New Hire Reporting

The State of Ohio requires that reporting be submitted for all new hires, rehires or the return to work of an employee who has been laid off, furloughed, separated, granted a leave without pay, or terminated from employment.

Ohio Revised Code section 3121.89 defines an employee as **"an individual who is employed to provide services for compensation to an employer and includes an individual who provides services to an employer under a contract as an independent contractor and who is an individual, the sole shareholder of a corporation, or the sole member of a limited liability company."** This statutory definition requires that Independent Contractors (persons for whom you are required to submit a 1099 form) be reported as new hires, subject to the exclusions offered by Section 5101 of the Ohio Revised Code. Exclusions to the reporting of independent contractors allowed by this section are: professionally licensed persons performing services under that license (i.e. a lawyer); or an individual who will receive compensation under contract of less than two thousand five hundred dollars (\$2,500) per year.

Paycor, our Payroll processor, will submit the Ohio New Hire Form for all new employees. For Independent Contractors, it is the responsibility of all Diocesan Entities to submit the New Employee Reports in a timely and accurate manner. This can be done by going on the web at Ohio New Hire Reporting to register or to obtain forms for each employee. Instructions are provided.



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905.0 - Other Documentation in Employee Files

In addition to the types of documents required to be kept in the employee's file by **policy 902 through 904**, the following documents are to be kept in the employee's file:

- A Comprehensive Job Description including FLSA status
- W2
- W4 and IT4
- Signed Employee Handbook Acknowledgment form
- Signed Cell Phone policy
- Documentation of New Hire Reporting (Ohio Revised Code section 3121.89)
- Conflict of Interest statement (where applicable)
- Group Benefit Enrollment forms including Long Term Care Application (copy)
- Retirement Plan Enrollment form (copy)
- Letter of Understanding
- Performance reviews
- Employment Contracts (where applicable)
- Employment Application
- Documentation on reference checks performed
- Criminal Background Check results and Protecting God's Children certificate

The types of documentation to be kept in an individual employee file, and the period of retention for each, are fully documented in the various **Records Retention policies in section 1600**.

It is acceptable that Criminal Background Check results are kept in a location with other Criminal Background Checks.

FMLA and medical information should never be kept in the individual employee's file. It should be maintained in a separate, confidential, and locked location. Additionally, any personal notes maintained on an individual employee should also be maintained in a separate, confidential, and locked location.

For parishes with schools, some of the above documentation may be kept by the Parish business office and some in the school office, provided all documentation is retained per the requirements of section 1600.