



Personnel Files Policy

Policy Section: Employment

Policy Number: 2.66

Effective Date: June 3, 2026

1. Policy Statement

The purpose of this policy is to establish consistent guidelines for the creation, maintenance, content, access, and confidentiality of personnel files for all employees within the Arkansas State University System (ASU System). This ensures compliance with applicable state and federal laws, promotes transparency, and protects the integrity and privacy of employee records.

2. Definitions

- A. Personnel File:** The official employment record maintained by an institution's Human Resources Department for each employee, including documents relevant to employment status and history.
- B. Employee:** Any person employed by an ASU System institution on a full-time, part-time, temporary, or permanent basis.
- C. Confidential Information:** Any information in the personnel file that is protected by federal or state privacy laws.

3. Policy Details

I. Scope

This policy applies to all employees of the ASU System, including faculty, staff, adjunct instructors, graduate assistants, and student workers, at all ASU System institutions and offices.

II. Contents of Personnel Files

Each employee's official personnel file shall include, but is not limited to, the following:

- Employment application
- Resume or curriculum vitae, if required in the hiring process
- Offer letter and acceptance of employment
- Employment contracts or appointment letters
- Job descriptions
- Performance evaluations and disciplinary records
- Documentation of promotions, demotions, transfers, and terminations
- Records demonstrating completion of mandatory employee trainings
- Records of certifications or degrees earned during employment
- Letters of commendation or reprimand
- Payroll and benefits documents (excluding confidential benefits records held separately)
- Required legal or compliance documents (e.g., I-9, W-4)

Note: Medical records, disability accommodations records, workers' compensation claims, grievance records, and background checks shall be maintained separately in accordance with applicable privacy laws and policies. They are nevertheless considered to be part of the employee's official personnel file.

III. Maintenance and Custody

Personnel files shall be maintained securely and managed by each institution's Human Resources Department (or designated institution HR office). The custodian of records is the highest-ranking HR official at the relevant ASU System institution and is responsible for ensuring files are accurate, complete, and up to date.

IV. Access to Personnel Files

- Employee Access:** Employees have the right to inspect their own personnel file in accordance with applicable law or to receive copies of their own personnel records.
- Supervisor Access:** Supervisors and institution administrators may access personnel files only to the extent necessary to make employment-related decisions (e.g., hiring, promotion, discipline) or as otherwise necessary to carry out official duties.
- Third-Party Access:** Access by individuals outside the ASU System shall be governed by applicable law (e.g., Arkansas Freedom of Information Act) and requires approval from the institution's Human Resources Department, the ASU System Human Resources Office, the ASU System General Counsel's

office, or the ASU System's designated Custodian of Records for FOIA fulfillment.

V. Confidentiality

Personnel files are confidential records and shall not be disclosed without the employee's written consent, unless otherwise required by law or as otherwise provided for in this policy. Records requested through Arkansas FOIA requests will be handled in accordance with Arkansas FOIA law, which includes various exemptions and requires 24 hours' notice to employees for appeals prior to distribution. Employees responsible for maintaining or accessing these records must uphold strict confidentiality standards.

VI. Retention and Disposal

Personnel files shall be retained in accordance with the ASU System records retention schedule and applicable state and federal regulations. Upon expiration of the retention period, records shall be securely destroyed.

VII. Corrections and Disputes

Employees may submit written requests to correct factual inaccuracies in their personnel file. If denied, a written rebuttal may be placed in the file alongside the disputed record.

VIII. Compliance and Review

This policy shall be reviewed periodically by the ASU System Office of Human Resources and General Counsel's Office to ensure compliance with evolving laws and institution needs. Violations of this policy may result in disciplinary action.

(Adopted by the Arkansas State University System Board of Trustees on June 3, 2026, Resolution #26-21.)