Artifact 1: Master Compliance & Record Lifecycle Guide (2026 Standards)

This document serves as the primary reference for auditing 47–60 employee records in El Monte, CA. It defines the relationship between legal mandates, organizational policies, and the resulting data assets.

1. The Mandate-to-Policy-to-Record Matrix

Parent (Mandate)	Child (Policy)	Grandchildren (Records)	Retention Period	Housing (Location)	Responsible Party
Labor Code § 1198.5 / SB 513	Personnel File Access & Training Policy	Education/Training records (Name, Provider, Duration, Competencies, Cert) [1, 2]	4 years [3]	**Main Personnel File**	HR
SB 294	Workplace Know Your Rights Act	Annual Notice Proof of Delivery; Emergency Contact designation [4, 5, 6]	3 years [7]	**Main Personnel File**	HR
Lab. Code § 6401.9 / SB 553	Workplace Violence Prevention Plan (WVPP)	Violent Incident Logs (redacted of PII); Investigation reports [4, 8]	5 years [8]	**Separate Safety/Investigation Log**	HR / Legal
29 CFR § 1630.14 (ADA)	Medical Privacy & Accommodation Policy	Interactive process notes; Medical certifications; Fitness-for-duty [2, 9]	4 years (CA) [2]	**Confidential Medical File**	HR Manager
8 CFR § 274a.2	Employment Eligibility Verification	Form I-9; copies of ID documents (if standard practice) [10, 2, 11]	Later of 3 yrs from hire or 1 yr post-term [2]	**Separate I-9 Binder/Folder**	HR
Lab. Code § 226 / FLSA	Itemized Wage Statement	Pay stubs; Gross/net	3–4 years [8, 13]	**Payroll System/Audit**	Finance

Parent (Mandate)	Child (Policy)	Grandchildren (Records)	Retention Period	Housing (Location)	Responsible Party
	Policy	wages; Total hours; All deductions [8, 12]		**Vault**	
ERISA § 107 & 209	Health & Retirement Benefit Admin	Enrollment forms; SPDs; SMMs; Vesting/Eligibility data [3, 14]	6 years to Indefinite [4, 14]	**Benefits File**	HR / Finance

2. Guarding Standards & Gatekeeping Protocols

Technical Standards (Digital)

- **Encryption:** All electronic records containing PII, PHI, or financial data must utilize **AES-256 encryption** at rest and in transit.[15, 16, 17]
- **FIPS Validation:** Cryptographic modules used by HRIS and Payroll vendors must be **FIPS 140-2 or 140-3 validated**.[18, 19, 20]
- **Access Control:** Access must follow the "Principle of Least Privilege" via **Role-Based Access Control (RBAC)**. Finance is strictly prohibited from viewing medical or performance records.[21, 22, 17]

Physical Standards (Vault)

- **Vault Rating:** Vital paper records should be stored in fire-resistive enclosures rated **UL 72 Class 350** for paper (maintaining <350°F internally).[23, 24, 25]
- **Environmental Control:** Vaults must maintain a stable environment (~70°F and 30-50% humidity) to prevent the degradation of paper assets.[26]

3. Statutory Snippets & Requirements for Compliance

A. Personnel File Definition (SB 513)

"Existing law grants... the right to inspect... personnel records... SB 513 clarifies that personnel records relating to the employee's performance now also include education and training records... [including] skills in equipment or software." [27, 2]

B. Workplace Know Your Rights (SB 294)

"On or before February 1, 2026, and annually thereafter, [employers must] provide a stand-alone written notice to each current employee of specified workers' rights... [and] offer all current employees... an opportunity to designate an emergency contact." [4, 28, 29]

C. Medical Privacy (CMIA)

"Each employer who receives medical information shall establish appropriate procedures to ensure the confidentiality and protection from unauthorized use and disclosure of that information." [30, 31]

4. Analytical Placeholders

(Placeholder for conducting analysis on upcoming California Supreme Court rulings regarding "shadow files" maintained by managers outside of central HR systems and the definition of "actual knowledge" in arrest notifications under SB 294.)

(Placeholder for determining organizational risk appetite regarding document scanning. Analysis will seek to balance the ease of digital retrieval with the high overhead of maintaining a physical UL-rated vault room.)