

Local Instruction 23-11 Record Retention

TO: Catawba Workforce Development Area

SUBJECT: Record Retention

ISSUANCE DATE: August 16, 2023

EFFECTIVE DATE: Immediately

EXPIRATION DATE: Indefinite

Purpose: The purpose of this instruction is to issue guidelines outlining expectations as it relates to retention and disposition of common records.

Background: The Catawba Workforce Area must have a records retention policy to ensure records are maintained to comply with state and federal laws, policies, regulations, and procedures. Local Area Administrators and the Statewide Grants Administrator must ensure that all records are maintained for the appropriate time frame.

Policy: The following record retention policy should be followed by all grantees of the Catawba Workforce Board. Grantee shall retain all records including financial, statistical, property, participant records and supporting documentation for five (5) years after the grantee submits to the Catawba Workforce Boards the final expenditure reports for that funding period. Records for nonexpendable property shall be retained for a period of five (5) years after final disposition of the property.

The grantee shall retain records beyond this period if any litigation or audits is begun or if a claim is instituted involving the local issued WIOA grants covered by the records. In such instances, the grantee shall retain records until the litigation, audit or claim has been resolved.

In the event of the termination of relationship, the Catawba Workforce Board shall be responsible for the maintenance and retention of the records of a grantee.

A grantee that goes out of business or is unable to retain records as described above will transfer all records above to the Catawba Workforce Board in an orderly manner. Each box will be labeled and in acceptable condition for storage. The Catawba Workforce Board will inventory the contents of each box prior to or upon acceptance. A sign-off sheet will be signed by the grantee and Catawba Workforce Board staff verifying inventory and records.

For Case Files of WIOA Applicants Who Were Never Enrolled

Hard copy case files for WIOA applicants who have complete applications but were not enrolled within 90 days of the eligibility determination or were determined ineligible for WIOA services must be maintained for **three years past the Eligibility Date.**

For Case Files of Individuals with a Partial WIOA Application

Hard copy case files for individuals with a partial WIOA application must be maintained for **three years past the Application Date**.

Electronic Document Management System (EDMS)


1. Catawba Workforce Board recommends that all documents are scanned at application
2. Please be sure you are continuously reviewing all your work to ensure accuracy, compliance, and completeness.
3. Ensure there are no full SSNs on any documents and there is no confidential or personality identifiable information (PII) in any scans.
4. Anything scanned in SCWOS does not need to be duplicated in a hard copy file.
5. Any document signed by the customer should be scanned in SCWOS.
6. Any document used for Data Validation or Verification should be scanned in SCWOS.

PLEASE DO NOT UPLOAD ANY OF THE FOLLOWING:

- **Documents containing social security numbers (unless they are redacted or blacked out)**
- **Medical and disability related documentation, or criminal records, as this would violate the medical or other privacy laws (documentation regarding legal or medical matters must be kept in a separate. Secure, locked file and as such notated in the participant's file)**
- **Documents that may be found elsewhere in the system such as resumes printed case notes, etc.**
- **Documents that are not necessary for case management personal notes, letters, etc.**

Action: Please ensure that all appropriate staff receive and understand this policy.

Inquiries: Questions may be directed to abaker@catawbacog.org


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