



RECORDS RETENTION

Background:

Workforce Innovation and Opportunity Act (WIOA) requires local Workforce Development Areas to maintain and retain records of all fiscal and program activities funded under the 2014 WIOA Act.

Policy:

This policy sets forth the following minimum timeframe requirements for records retentions, and the extent to which such records may be made available.

The Northwest Georgia Workforce Development Board, fiscal agent, administrative office, and any **Sub recipient/ Contractors** of WIOA funds shall:

1. Record Retention

- a. Retain all records pertinent to the **Sub recipient/Contractor** Contract, grant, grant agreements, interagency agreements, contracts or any other award, including financial, statistical, property, applicant or registrant records, and supporting documentation, for a period of not less than six (6) years after submittal of the final expenditure report (closeout) for that funding period to the awarding agency.
- b. If prior to the expiration of the six (6) year retention period, any litigation or audit is begun or a claim is instituted involving the grant or agreement covered by the records, the **Sub recipient/Contractor** shall retain the records beyond the six (6) year period until the litigation, audit findings, or claim has been finally resolved.
- c. If non-expendable property was acquired through WIOA funds or assigned to a **Sub recipient/Contractor** by NWGRC, the Contractor shall retain all records of non-expendable property for a period of at least six (years) after final disposition of the property.
- d. Retain all records pertinent to applicants, registrant, eligible applicants/registrants, participants, for a period of not less than (6) years from the close of the applicant program year.
- e. Retain records regarding complaints and actions taken on the complaints for period of not less than (6) years from the date of resolution of the complaint.
- f. Should the **Sub recipient/Contractor** cease to do business within the six (6) years period or thereafter during the required record retention period, the **Sub recipient/Contractor** agrees to forward all records (financial, participant, statistical property), complete in form, to NWGRC. The **Sub recipient/Contractor** shall retain sole liability for the content of such records.
- g. The **Sub recipient/Contractor** understands and agrees that when requested, the **Sub recipient/Contractor** shall complete and furnish to NWGRC or its Designee all forms, reports, documents, and records within ten (10) days of said request. Failure to comply with this

provision will result in NWGRC withholding any reimbursement due the Sub recipient/Contractor until such time that the Sub recipient/Contractor complies with NWGRC's request.

- h. Record maintenance. The Sub recipient/Contractor assures that it will maintain records sufficient to determine the amount and applicable cost category for all expenditures.

2. Record Destruction/Disposal

After a period of not less than six (6) years and disposal of documents are necessary, a memo requesting Record Destruction and file listing should be submitted by the Sub recipient/Contractor or staff and retained by the WIOA Department or Financial Department. The request shall include:

- a. Sub recipient/Contractor or staff written request of destruction
- b. The records/content to be destroyed (list of names of each file)
- c. The date of records destruction
- d. The manner of records destruction (it's recommended that the Sub recipient/Contractors use their company policy for destruction of records).

No staff, Sub recipient/Contractor has the authority to destroy any records without the written approval from the WIOA Director.

References:

Workforce Innovation and Opportunity Act
State of Georgia Economic Development Workforce Division Policy Manual