



Administrative Policies

Records Retention Policy

POLICY #: 3004, Rev. 2

EFFECTIVE: December 15, 2023

SUPERSEDES: Records Retention and Public Access Policy #3004, Rev. 1, effective 9-1-21

PURPOSE:

This policy sets forth the minimum record retention requirements for WorkForce Central and its grant recipients.

The purpose of this policy revision is to:

- Remove references to public records requests which are now located in WorkForce Central's new Public Records Request Policy located on WorkForce Central's [Policy Library](#).
- Broaden the scope of WorkForce Central's record retention requirements beyond those associated with federally funded activities.
- Non-substantive editing for clarity purposes.

BACKGROUND:

WorkForce Central and its grant recipients are required to maintain and retain records of all fiscal and program activities funded with WorkForce Central grants. Recipients must keep records that are sufficient to permit the preparation of reports required by the funder (when applicable) and the tracing of funds to a level of expenditure adequate to ensure the funds have been spent lawfully.

WorkForce Central follows the Local Government record retention, archiving and document destruction guidelines provided by the [Office of the Secretary of State of Washington State Archives](#) which requires a minimum six (6) year record retention period for most, but not all records.

POLICY:

The minimum record retention requirements are as follows:

- Retain all records pertinent to grants, grant agreements, interagency agreements, contracts, or any other award, including financial, statistical, property, and supporting documentation, for a period of at least six (6) years after submittal of the final expenditure report (closeout) for that funding period to the awarding agency.
- Records for real and non-expendable property and equipment must be retained for six (6) years after final disposition.
- Retain records regarding complaints and actions taken on the complaints for at least six (6) years from the date of resolution of the complaints.
- For federally funded records:
 - Retain all program and data validation records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment for a period of not less than six (6) years after the end of the fiscal year.
 - After documents have been retained for the six (6) years, staff shall refer to their organization's guidelines for archiving and/or destroying of confidential information.
- All records retained beyond the mandatory retention period are subject to audit and/or review.

Copies of records created by scanning, copying, or similar methods may be substituted for original records if they are preserved with integrity and are admissible as evidence.


Exceptions to the six (6) year retention policy

- Retain all records beyond the required six (6) years if any litigation or audit is under way or a claim is instituted involving the grant or agreement covered by the records. The records must be retained for at least six (6) years after the litigation, audit, or claim has been resolved.
- In the event of termination of the relationship between WorkForce Central and grantee, the grantee will be responsible for the maintenance and retention of their WorkForce Central awarded records for the minimum six (6) year timeframe. However, if the grantee is unable to maintain and retain its own records, WorkForce Central will assume the responsibility of maintaining and retaining the grantee's records at which time the grantee is no longer subject to the six (6) year record retention policy.
- When records are transferred to or maintained by the awarding agency or pass-through entity, the six (6) year retention policy is no longer applicable to WorkForce Central.

REFERENCES:

- Public Law 113-128, WIOA of 2104, Section 185(a)
- 2 CFR Part 200.334
- 29 CFR 37.37
- 29 CFR 97.42
- RCW 40.14
- RCW 42.17.020(1)
- Secretary of State of Washington State Archives Local Government Common Records Record Retention Schedule
- ESD WIOA Policy 5403, Rev. 2 – Records Retention and Public Access

APPROVED:


Katie Condit (Dec 15, 2023 10:01 PST)
Katie Condit, WorkForce Central CEO

Dec 15, 2023

Date

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