

**Region 4 Workforce Development Board
Record Retention/Archiving Policy**

PURPOSE: To provide guidance on procedures for the record retention and achieving of all records pertinent to all grants and agreements, including financial, statistical, property and participant records and supporting documentation.

GENERAL PROVISIONS:

I. GENERAL PROVISIONS FOR RECORD RETENTION

- A. Region 4 Workforce Development Board (R4WDB) requires that all records pertinent to all grants and agreements, including financial, statistical, property and participant records and supporting documentation be retained for three (3) years following the date on which the annual expenditure report (final report) is submitted to the Indiana Department of Workforce Development.
- B. All records shall be retained according to the prescribed periods:
 - If a claim is instituted involving the grant or agreement covered by the records, the records will be retained until the litigation, audit or claim has been resolved.
 - In the case of grievances or discrimination complaints, records must be retained for three (3) years following the date of the resolution.
 - Non-expendable property records must be retained for a period of three (3) years from the date of final disposition of property. Property records consist of purchase documents, inventory records and disposition documents.
- C. Disallowed costs can result from inadequate documentation and record retention. All service providers will be required to have a record retention procedure and R4WDB will ensure compliance through compliance assurance reviews. In the event of the termination of the relationship with a service provider, R4WDB shall be responsible for the maintenance and retention of the service provider WIA records.

II. GENERAL PROVISIONS FOR ACCESS TO RECORDS

- A. R4WDB, and other oversight entities in coordination with R4WDB, shall have the right to timely and reasonable access to the service provider, premises, personnel, monitoring, auditing, evaluation, or interview and discussion, related to all records required to be retained which exist for the purposes of accomplishing the goals of the contract. The service provider will give the appropriate entities timely and reasonable access to copy or mechanically reproduce all reports, books, papers, documents, automated data systems and other records pertaining to contract awards through R4WDB.
- B. Timely and reasonable access to records shall be made available to the public upon request, notwithstanding provisions of State or local law. This requirement does not apply to:
 - Disclosure of information that would constitute a clear unwarranted invasion of personal privacy; or
 - Trade secrets or commercial or financial information obtained from a person that is privileged or confidential.
- C. A fee may be charged to the extent sufficient to recover the cost applicable to processing such request. The rights of access in this section are not limited to the required retention period but shall last as long as the records are retained.

III. GENERAL PROVISIONS FOR STORAGE OF RECORDS

- A. R4WDB shall implement and maintain a security system for all records and supporting documentation, with particular attention to the reasonable safeguard of confidential data.
- B. Maintenance of records must allow for reporting, monitoring, audit and evaluation activities. The records must be stored in a secure manner. Off-site storage is acceptable provided that security and facility conditions provide adequate protection for the records and the ability to access them as required.

- C. Records must be retained and stored in a manner that will preserve their integrity and admissibility as evidence in any audit or other proceeding. The burden of production and validity of authentic records shall be on the custodian of records.

IV. GENERAL PROVISIONS FOR ARCHIVING RECORDS

- A. All WIA client participant records will be housed in a central location. All client participant records to be archived must be physically delivered to R4WDB by the 15th working day of each month for clients archived the preceding month. The Participant File Transfer Form (Attachment A) must accompany all files transferred to R4WDB. Archived files will not be released from R4WDB to service providers in the case of a new enrollment; service providers will be required to create a new case file.
- B. All archived files must be complete. Each file is to be labeled as shown below.
- C. When an enrolled customer has received training or supportive services (when funds have been expended) and no service has been provided for 90 days (exited), the file may be archived after follow-up when information from Management Information Team report has been received.

The case note requires the Date of Archive in the case note.

The label is to be typed in the following manner, legibly, on plain white adhesive label and affixed to the front left-hand cover of the file folder:

<p>Last Name, First Name, MI Social Security Number County (where services provided) Provider name Program Exit Date Archived Date</p>

Revised-Effective Date: January 2011 reflects archiving client file after follow

Revised-Effective Date: July 1, 2011 reflects DWD Customer Flow Policy

Region 4 Workforce Investment Board Record Retention

The chart below shows when participant records may be destroyed.

Participant Information		
PY 03 Exits	(7/1/2003 – 6/30/2004)	Destroy on or after 7/1/2008
PY 04 Exits	(7/1/2004 – 6/30/2005)	Destroy on or after 7/1/2009
PY 05 Exits	(7/1/2005 – 6/30/2006)	Destroy on or after 7/1/2010
PY 06 Exits	(7/1/2006 – 6/30/2007)	Destroy on or after 7/1/2011
PY 07 Exits	(7/1/2007 – 6/30/2008)	Destroy on or after 7/1/2012
PY 08 Exits	(7/1/2008 – 6/30/2009)	Destroy on or after 7/1/2013
PY 09 Exits	(7/1/2009 – 6/30/2010)	Destroy on or after 7/1/2014
PY 10 Exits	(7/1/2010 – 6/30/2011)	Destroy on or after 7/1/2015
PY 11 Exits	(7/1/2011 – 6/30/2012)	Destroy on or after 7/1/2016
PY 12 Exits	(7/1/2012 – 6/30/2013)	Destroy on or after 7/1/2017
PY 13 Exits	(7/1/2013 – 6/30/2014)	Destroy on or after 7/1/2018
PY 14 Exits	(7/1/2014 – 6/30/2015)	Destroy on or after 7/1/2019
PY 15 Exits	(7/1/2015 – 6/30/2016)	Destroy on or after 7/1/2020

Participant File Archive Form

Attachment A

Service Provider: _____

County: _____ **Re: (program)** _____

<u>Client Name</u>	<u>Last 4 SS#</u>	<u>Exit Date</u>	<u>Received</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

In signing below, I certify that the above mentioned client file(s) have been physically transferred to the following stated office _____ on _____ day of _____, 20____.

Transferring Organization _____

Signature *Printed name*

Receiving Organization _____

Signature *Printed name*