

1600POL Records and Documentation Retention (Rev2)

Effective Date: July 2020

Last Modified: July 2022

The Olympic Workforce Development Council follows state and federal laws and regulations to ensure Workforce Innovation and Opportunity Act (WIOA) Title I financial and program records meet the provisions of *WIOA Policy 5403 Records Retention and Public Access*, and the Washington State Archive Local Government Common Records Retention Schedule (CORE).

- 1. WIOA Title I contract, agreements, or any other award, including financial, statistical, and property records and documentation fall within CORE GS2011-184 Rev3 regulations and have a 3-year retention schedule.**
 - a. Final expenditure report (closeout) submittal initiates retention period.
 - i. Exception: if unless litigation, audit, or claim involving the contract begins, the retention begins on the date of resolution.
 - b. Non-expendable property records have a 3-year retention period after final disposition of property.
 - c. Complaints and actions taken have a 3-year retention period from the date of resolution.
- 2. WIOA Title I participant and confidential files are maintained per *WIOA Policy 5403 Records Retention and Public Access* and have a 6-year retention period.**
 - a. Subrecipients and contractors house and maintain participant files under the laws and regulations of specific federal, state, and local law requirements.

NOTE: Recent *Washington Information Notice (WIN) Records Retention and Public Access policy 5403 (Rev1)* effective Jun 16, 2022, updated retention to align with Secretary of State Common Records Retention Schedule (CORE) which changes the above retention periods. Previous contracts, agreements (all items listed in #1) had a 6-year retention period and participant files (all items listed in #2) had a 3-year retention period.
- 3. OWDC contractors and subrecipients are required to manage the cost of storage and keep records and documents in a manner to prevent loss or damage.**
 - a. Storage costs shall be entered as a liability, requiring payment to the vendor.
- 4. WIOA Title I records and documents will be made available in the case of audits, monitoring, and/or examination by the Olympic Consortium Board (OCB), Olympic Workforce Development Council (OWDC), U.S. Department of Labor (DOL), or The State of Washington.**
 - c. This right also includes timely and reasonable access to Contractor's and subcontractor's personnel, for the purpose of interviews and discussions related to such documents.
- 5. The statewide Management Information System, Efforts to Outcomes (ETO), houses all program participant records and documentation per *1611TSK Digital Documentation* procedure.**
 - a. If specific documentation is not obtained or required, case notes within the participant record must explain why documentation is missing or unnecessary.
 - b. Records retained beyond the mandatory retention period are subject to audit and/or review.

6. **Confidential files are defined as** medical or legal documentation which includes information covered under HIPAA or PPII information required to determine WIOA program eligibility or participation in training services or outcome “Medical Exit” verification that is not entered into case management system (ETO).
 - a. Confidential (medical/legal) information must be kept in physical paper form in subrecipient designated locked file cabinet.
 - i. Files are required to be labeled with Case Management number (ETO#), last name (at least), and date of exit (to verify retention dates).
 - ii. A dated note/letter of staff explanation for keeping information.
 - iii. Participant medical information has a three-year retention after date of exit and will be kept in confidential file cabinet until retention is met (see also *Management of Medical and Disability Related Information, WIN 0023(Change 2)*).
7. **Protection of personally identifiable information (PII) will be housed per 1601POL Protection of Personally Identifiable Information policy.**
8. **The OWDC acknowledges subrecipient use of a participant “Working File”.**
 - a. Working files are defined as physical documents not yet uploaded into applicable TouchPoints (TP). This may include:
 - i. Missing pages or documentation
 - ii. Missing or incomplete information
 - iii. Documents waiting signature (application, purchase orders, etc.)
 - b. Once documentation is uploaded into case management system (ETO#), subrecipients are required to destroy Working File and all applicable documentation.
 - c. All working file documentation is subject to audit and/or review (per #4 above).
9. **Once a record or document reaches retention date (three-years after exit date), the record is required to be logged (see below) per CORE destruction procedure and destroyed.**
 - a. Destruction logs are required, have an indefinite retention period, and are to be kept in Confidential file cabinet and must include:
 - i. Case management number (ETO#)
 - ii. Last name and first initial
 - iii. Date of exit (to verify retention was met)

References

Financial Transactions – General, Washington State Archive Local Government Common Records Retention Schedule [CORE, GS2011-184 Rev3](#)

Management of Medical and Disability Related Information, Washington Information Notice (WIN) [0023 \(Rev2\)](#)

OWDC Digital Documentation Procedure 1611TSK

OWDC Protection of Personally Identifiable Information Policy 1601POL

Records Retention and Public Access, [Workforce Innovation and Opportunity Act Policy 5403 \(Rev1\)](#)