

Region VI Workforce Development Board 17 Middletown Road White Hall, WV 26554	Record Retention policy
	Date June 7, 2021

Region VI Guidance Letter 10-15, R-1

To: All Workforce West Virginia system stakeholders  
All WorkForce West Virginia Centers  
All Local Training Providers

From: Region VI Workforce Development Board

Subject: Record Retention policy

1. **Purpose:** To establish policy on the requirements and procedures for the retention of records relating to WIOA contract funds.

2. **References:** Uniform Guidance: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

3. **Background:** The Region VI Workforce Development Board (WDB), being a subrecipient of DOL federal funds under the Workforce Development Act (WIOA), is responsible for providing guidance on how records compiled in support of activities provided under contract to the WDB, utilizing WIOA funds, will be treated.

References:

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128 Section 116(i), Fiscal and Management Accountability Systems
- WIOA Section 184, Uniform Administrative Requirements
- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule
- 2 CFR Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Department of Labor (DOL) Exceptions)
- 2 CFR 200.333

4. **Policy:** The WDB and its' contractors will, at a minimum, meet the following standards for the retention of records:

Record Retention: Financial records, supporting documents, statistical records, and all other records pertinent to a contract shall be retained:

A) For financial records - a period of five (5) years from the date of approval of the annual contract closeout report for each program year;  
(Ex. – An invoice for supportive services for a youth was paid in March of 2003, or Program Year 2002 (July 1, 2002 thru June 30, 2003). The contract closeout

for Program Year 2002 was approved on October of 2003. 5 years from October of 2003 is October of 2008. Unless an exception has occurred, this financial record can be destroyed after October of 2008.) and / or

**B) For program participant records** – a period of (five) 5 years after the program year in which the participants exited from WIOA Adult, Dislocated Worker, or Youth programs.

(Ex. – A participant exited from WIOA Adult OJT in July of Program Year 2004 (July 1, 2004 through June 30, 2005.) 5 years start from July 1, 2005. That participant file must be kept through June 30, 2010, or 5 program years.)

**Exceptions** are as follows:

- If any litigation, claim, or audit is started before the expiration of the 5-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

Rights of Access to Records: The awarding agency or any of their duly authorized representatives will have the right of timely and unrestricted access to any records that are pertinent to the contract in order to make audits, examinations, excerpts, transcripts and copies of such documents. Reasonable access will be given to personnel for the purpose of interview and discussion related to such documents.

*The rights of access addressed in the previous paragraph are not limited to the required retention period, but shall last as long as records are retained.*

**5. Expiration Date:** This policy shall be in effect until revised or cancelled by the Region VI Workforce Development Board.