

## RECORD RETENTION POLICY

Effective Date: September 19, 2019

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### **PURPOSE:**

The purpose of this policy is to clarify the procedures for Contractors, Vendors, WDB and One-Stop Operators as it relates to record retention. Retention of records related to activities and services conducted with WIOA and other funds under the Region VII Workforce Development Board must adhere to the procedures and regulations established by this policy.

### **REFERENCES:**

Workforce Innovation and Opportunity Act of 2014 (WIOA)

OMB, 2 CFR Part 200

Eastern West Virginia Community Action Agency, Inc. Record Retention Policy (Attachment A)

### **BACKGROUND:**

The Region VII Workforce Development Board (WDB) is releasing a Record Retention Policy in order to ensure accountability for records resulting from activities and services conducted with WIOA and other activities funded by the WDB. Some of the reasons to keep files and records include legal requirements and/or compliance with governing rules, potential relevance in future litigation, and the needs of the organization, as well as historic importance.

### **POLICY STATEMENT:**

Minimum record retention requirements are established as part of an effective internal and external control program to ensure that Contractors, Vendors, WDB and One-Stop Operators can provide the documents requested by any federal, state and local agencies within the statutes of limitations. In general, the Region VII WDB requires that Contractors, Vendors and Operators maintain records for at least the minimum periods but encourages Contractors to retain records for at least one-year longer than the minimum requirement. All Contractors, Vendors, and Operators will comply with Region VII WDB requirements for record retention.



## **Region VII Workforce Development Board Record Retention Policy and Procedures**

As part of effective internal controls, Contractors, Vendors, WDB and One-Stop Operators should establish and monitor their own Record Retention Policy and Procedures. At a minimum, the standards identified in the Region VII Workforce Development Board's Record Retention Policy must be followed by any entity receiving funding from the Region VII WDB. Contractor, Vendor and Operator record retention responsibilities are outlined in this document.

### **1. Complete and accurate record retention process summary**

- a. Records must be maintained in a suitable location based on the nature of the documents and filed in a manner supporting ease of access.
- b. Records are to be maintained for at least the minimum required retention period.
- c. Periodically WDB staff will review record maintenance, retention and access to ensure security and that policy and procedures are being followed.
- d. Following the record retention period, all records must be purged in an appropriate manner.

### **2. Record retention policy and time periods**

- a. Proper procedures for record maintenance, retention, and access to records in all major areas including; contracts, participant records, fiscal management and documentation.
- b. Contractors, Vendors, and Operators will be responsible for establishing and maintaining adequate accounting books, records and controls sufficient to accurately track and report all financial transactions related to work performed, and costs incurred, under the Agreement with the Region VII Workforce Development Board.
- c. Maintain original source documents as evidence of all work performed, and costs incurred. All records, data or information related to the Agreement with the WDB are to be retained separately and distinctively from the records pertaining to other operations.
- d. Where records having one retention period cannot be separated from records having a longer retention period, both records should be retained for the longer period.
- e. Maintain all financial, statistical, property, applicant and participant records, and all applicable supporting documentation according to EWWCAA retention schedule (Attachment A).
- f. OMB Circular A-110.53 states:

Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency. The only exceptions are the following:

- i. If any litigation, claim, or audit is started before the expiration of the three-year



- period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken;
- ii. Records for real property and equipment acquired with Federal funds shall be retained for three years after final disposition;
  - iii. When records are transferred to or maintained by the Federal awarding agency, the three-year retention requirement is not applicable to the Workforce Board; and
  - iv. Indirect cost rate proposals, cost allocations plans, etc.
- g. Contractor, Vendor and Operators will hold a written record of documents maintained, location retained, and document purge dates.
  - h. In the event the Contractor becomes unable to retain the required WIOA participant and financial records, the records must be immediately transferred to the WDB's possession. Such records must be transmitted to the Region VII Workforce Development Board for acceptance in an orderly fashion with documents properly labeled and filed in an acceptable condition for storage. In the event the WDB is unable to accept the required WIOA participant and financial records, the records must be immediately transferred to WorkForce West Virginia or its designee.
  - i. No records should be disposed of without the prior written approval of the Region VII Workforce Development Board designated staff.
  - j. Contractors, Vendors and Operators will make available and provide access to any and all books and records pertaining to performance of work and/or costs billed under the Agreement with the WDB, to the Region VII Workforce Development Board, WorkForce West Virginia, Federal Funding or Regulatory Agencies and/or their designees, such as the United States Department of Labor. Such right to audit will correspond with the above referenced record retention period for the Contractor, Vendor or Operator.
  - k. In case of doubt, authorization for release or review of any public records generated fully or as part of the Agreement or Contract with the Region VII Workforce Development Board should be directed to the WDB's Executive Director.

### **3. WIOA Applicant and Registrant Customer File Maintenance**

- a. Contractors, Vendors and Operators must maintain hard copy customer files containing documents and forms in an appropriate storage space that ensures security and confidentiality.
- b. Access to customer file information should be restricted to authorized entities associated with the operation and performance of WIOA programs.
- c. Customer medical information should be recorded on separate forms and stored separately from main program files. To ensure confidentiality, access to these separate medical files should be limited to direct program managers. Such medical information may include, but is not limited to the following;
  - i. Insurance application forms



- ii. Health certificates or certifications
- iii. Physical exam results
- iv. Medical assessment results
- v. Medical history records
- vi. Applicable Board of Education Individualized Education Plan (IEP)

#### **4. Consequences of non-compliance with record retention policy**

- a. Failure to comply with proper record maintenance, retention and access, may result in the Region VII Workforce Development Board terminating the Agreement with the Contractor, Vendor or Operator. Ensuring record retention for the required periods is the responsibility of the Contractors, Vendors and Operators.
- b. Failure or refusal by Contractors, Vendors or Operators to provide Workforce Development Board staff access to records for review may result in the Region VII WDB terminating the Agreement and initiating action to ensure proper record retention for the required periods at the expense of the Contractor, Vendor or Operator.

#### **5. Tracking record retention**

- a. Contractors, Vendors and Operators must track, record and maintain all retention processes.
- b. If Contractor, Vendor or Operator employee misconduct occurs in matters of record maintenance or retention and results in improper purging, improper release of information, or other violations of record retention security, the Workforce Development Board designated staff must be notified immediately.



**Equal Opportunity and Grievances:** The Region VII Workforce Development Board prohibits discrimination in all aspects of the administration, management, and operation of Workforce Innovation and Opportunity Act programs and activities. Services offered at the Region VII WorkForce WV Career Centers will be provided universally without regard to race, color, religion, sex, national origin, age, disability, or political affiliation or belief. Individuals may file a complaint or grievance by following the Region VII Workforce Development Board Grievance Procedure Policy, a copy of which will be provided upon request.

**Questions:** Contact the Region VII Workforce Development Board Executive Director, 151 Robert C. Byrd Industrial Park Road, Suite 2, Moorefield, WV 26836. Telephone number is (304) 530-5258. Fax number is (304) 530-5107.

**Expiration:** Effective until rescinded, in writing, by the Region VII Workforce Development Board.




T.J. Van Meter, Executive Director



Date



Layne Diehl, Chairperson Region VII WDB



Date



## **RECORD RETENTION**

### **Policy**

It is the policy of EWVCAA to retain records as required by law and to destroy them when appropriate. The destruction of records must be approved by the Chief Financial Officer and logged into the Agency's Destroyed Records Log. The formal records retention policy of EWVCAA is as follows:

#### **Accounting Records**

<b>Document</b>	<b>Retention period</b>
Accounts payable	7 yrs
Accounts receivable	7 yrs
Audit Reports	Permanently
Cash books	Permanently
Chart of accounts	Permanently
Correspondence (legal and tax related)	Permanently
Correspondence, general	2 yrs
Depreciate schedules	Permanently
Expense records	7 yrs
Financial statements (annual)	Permanently
Fixed asset purchases	Permanently
General Ledger	Permanently
Internal audit reports (miscellaneous)	3 yrs
Inventory records	7 yrs
Invoices to customers or from vendors	7 yrs
Loan payment schedules	7 yrs
Payroll records and summaries	7 yrs
Petty cash vouchers	3 yrs
Physical inventory tags	3 yrs
Plant cost ledgers	7 yrs
Purchase orders (1 copy)	7 yrs
Receiving sheets	1 yr
Sales records	7 yrs
Subsidiary ledgers	7 yrs
Tax returns, revenue agents' reports and other documents relating to determination of income tax liability	Permanently
Trial Balances (monthly)	5 yrs

Revised: 3/11/2011

Approved:



## **Bank Records**

<b>Document</b>	<b>Retention period</b>
Bank reconciliations	2 yrs
Bank statements	7 yrs
Canceled checks	7 yrs
Deposit slips	5 yrs
Electronic payment records	7 yrs

## **Corporate Records**

<b>Document</b>	<b>Retention period</b>
Board minutes	Permanently
Business licenses	Permanently
Bylaws	Permanently
Contracts – major	Permanently
Contracts – minor	Life + 4 yrs
Insurance policies	Life + 3 yrs
Insurance records, accident reports, claims, policies, etc.	Permanently
Leases / mortgages	Permanently
Patents / trademarks	Permanently
Shareholder records	Permanently
Stock registers	Permanently
Stock transactions	Permanently
Trade mark registrations	Permanently

## **Employee Records**

<b>Document</b>	<b>Retention period</b>
Benefit plans	Permanently
Employee files (ex-employees)	7 yrs
Employment applications	3 yrs
Employment taxes	7 yrs
Expense reports	7 yrs
Payroll records, summaries and tax returns	7 yrs
Pension / profit sharing plans	Permanently
Safety records	6 yrs
Time cards and daily reports	7 yrs

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## **Real Property Records**

<b>Document</b>	<b>Retention period</b>
Appraisals by outside appraisers	Permanently
Construction records	Permanently
Lease payment records	Life + 4 yrs
Leasehold improvements	Permanently
Real estate purchase	Permanently