

	<b>PROGRAM PROCEDURE P-PPC: RECORDS RETENTION</b>
	<b>DATE: 7/1/16</b>
	<input checked="" type="checkbox"/> <b>NEW</b> <input type="checkbox"/> <b>REVISED</b>

Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW) and any sub-recipient of WIOA funds will incorporate into their management systems the following procedures for the management of all WIOA records.

1. Retain all records and documents pertinent to the grants, grant agreements, interagency agreements, contractors or any other award, including financial, statistical, or other pertinent records, and supporting documentation, for a period of at least three years after the original submission of Office of Community Colleges and Workforce Development’s final expenditure report (closeout) for that funding period to the federal Department of Labor.
  
2. Retain all records of non-expendable property for a period of at least three years after final disposition of property.
  
3. Retain indirect cost records such as computations or proposals, cost allocation plans, and supporting documentation for three years from the date the indirect cost rate package is submitted for negotiation. If not submitted for negotiation, the three-year period identified in (1) above shall apply;
  
4. Retain all records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment for a period of not less than three years from the close of the applicant program year. Such records must be maintained as whole record system;
  
5. Retain records regarding complaints and actions taken on the complaints for a period of not less than three years from the date of resolution of the complaint;
  
6. Retain all records beyond the required three years if any litigation or audit has begun or a claim is instituted involving the grant or agreement covered by the records. The records shall be retained until the litigation, audit, or claim has been resolved or the required three years, whichever period is longer.

In the event that sub-recipients are unable to keep their records, NOW will take custody and be responsible for the maintenance and retention of the records of any fiscal agent or sub-recipient.

#### Disposal

No records addressed in this policy shall be disposed of without instruction from or approval of NOW. NOW will provide instructions and timelines for disposing of records. Any records that are confidential in nature, including participant records, must be shredded, or similarly destroyed. Non-confidential records may be recycled. If there is any outstanding litigation or audit claim begun on records prior to termination of retention, the records will be retained until resolution of litigation or audit claim.

#### **REFERENCES**

WIOA

2 Code of Federal Regulations Chapter I, Chapter II, Part 200

Community Colleges and Workforce Development (CCWD) Policy 589-40.4, Records Retention and Public Access

Oregon Revised Statutes Chapter 192, Public and Private Records; Public Reports and Meetings

One-Stop Comprehensive Financial Management Technical Assistance Guide