

	POLICY P16: RECORDS RETENTION
	EFFECTIVE DATE: 7/1/16
	REVISION: 3/21/2020
	APPROVED BOARD REVISION: 6/2022
	INTERNAL REVIEW CONDUCTED: 4/2022
	<input type="checkbox"/> NEW
	<input checked="" type="checkbox"/> REVISED

PURPOSE:

This policy is to establish records retention guidelines for sub-recipients.

POLICY:

Northwest Oregon Works (NOW) and any sub-recipient of WIOA funds will comply with all WIOA, federal, state, and local policies on records retention and will incorporate into their management systems the following procedures for the management of all WIOA records.

Sub-recipients will:

1. Retain 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 grant closeout.
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 is determined.
4. Retain all records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminated participants, employees, and applicants for employment for a period of not less than three years from the close of the applicant program year.
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 participant records until instructed by NOW they can be disposed.
7. Retain all fiscal records in accordance with state policies and Uniform Administrative Rules.

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 subrecipients 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

Any records that are confidential in nature, including participant records, must be shredded, or similarly destroyed. Non-confidential records may be recycled. Record disposals must be approved by NOW prior to any disposal procedures and subrecipients will receive written authorization rejection or accepting all requests.

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.

Compliance

NOW will have the right to access subrecipient records. Subrecipient will receive an annual monitoring guide that requires a description of procedures used to comply with NOW's record retention and disposal requirements. NOW will perform various monitoring procedures to ensure all pertinent program and financial records are retained and disposed of in accordance with this policy. These procedures will be determined on an annual basis after NOW's subrecipient risk assessment and planning considerations.

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