

South Central Workforce Development Board (SCWDB)



POLICY: RECORD RETENTION POLICY

EFFECTIVE DATE: MARCH 12, 2026

POLICY NUMBER: 2026-02
(Supersedes Policy 2016-03)

SUBJECT: RECORD RETENTION

1. PURPOSE

The purpose of this policy is to establish requirements for the retention, maintenance, access, and disposition of records related to programs and activities funded under the Workforce Innovation and Opportunity Act (WIOA). This policy ensures compliance with federal regulations, state administrative guidance, and applicable record retention requirements.

2. AUTHORITY

This policy is established pursuant to the following authorities:

Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128, WIOA Section 185 - Records and Reports, WIOA Section 188 - Nondiscrimination, 2 CFR Part 200 - Uniform Administrative Requirements, 20 CFR Part 683 - Administrative Provisions Under WIOA, 29 CFR Part 38 - Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIOA, Applicable Kentucky Workforce Development policies

3. POLICY STATEMENT

The South Central Workforce Development Board (SCWDB) and its subrecipients shall maintain all financial, programmatic, statistical, participant, and administrative records related to WIOA-funded activities in accordance with federal and state record retention requirements. Records must be accurate, complete, accessible, and maintained in a manner that allows for monitoring, audit, investigation or evaluation by authorized entities.

4. RECORD RETENTION PERIOD

In accordance with 2 CFR 200.334, all records pertaining to WIOA programs must be retained for a minimum of three (3) years from the date the final expenditure report is submitted to the awarding agency.

If any litigation, claim, audit, monitoring review, or investigation involving the records begins before the expiration of the three-year retention period, the records must be retained until all issues have been resolved and final action has been taken.

5. TYPES OF RECORDS COVERED

Records subject to this policy include, but are not limited to:

Programmatic Records

- Participant eligibility documentation
- Assessment records
- Individual Employment Plans (IEPs) / Individual Service Strategies (ISS)
- Case management notes
- Service Program documentation
- Work-based learning documentation
- Follow-up records

Fiscal Records

- General ledgers
- Financial reports
- Expenditure documentation
- Payroll records
- Invoices
- Contracts and subrecipient agreements
- Cost allocation documentation

Administrative Records

- Board meeting minutes
- Procurement documentation
- Monitoring reports
- Corrective action plans
- Policy and procedure documentation

Data Validation Records

Documentation supporting performance reporting and data validation requirements must be maintained in accordance with the U.S. Department of Labor Employment and Training Administration guidance.

6. EQUIPMENT AND PROPERTY RECORDS

Records related to equipment purchased with WIOA funds must be retained for three (3) years after the final disposition of the equipment in accordance with 2 CFR 200.313 and 2 CFR 200.334.

7. ELECTRONIC RECORDS MANAGEMENT

Records may be maintained in paper or electronic format provided they meet the standards outlined in 2 CFR 200.335. Electronic records must:

- Accurately reflect the original information
- Be accessible for review and reproduction
- Maintain data integrity and security
- Be backed up regularly

Electronic systems must allow records to be retrieved for monitoring, audit, and evaluation purposes.

8. ACCESS TO RECORDS

In accordance with 2 CFR 200.336, authorized representatives of the following entities must be provided access to records upon request:

- U.S. Department of Labor
- U.S. Department of Labor Office of Inspector General
- Kentucky Office of Employment and Training
- Other federal or state oversight agencies
- Independent auditors

Access includes the right to examine, copy, and audit records.

9. CONFIDENTIALITY & PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

All records containing personally identifiable information (PII) must be maintained in accordance with confidentiality requirements under WIOA Section 188 and 29 CFR Part 38.

Appropriate safeguards must be implemented to ensure that participant information is protected from unauthorized access, disclosure, or misuse.

10. RESPONSIBILITIES OF SUBRECIPIENTS & CONTRACTORS

All subrecipients, service providers, one-stop operators, and contractors receiving WIOA funds through the South Central Workforce Development Board must comply with the record retention requirements outlined in this policy.

Subrecipients must ensure that records are available for monitoring, audit, and review by authorized entities.

11. RECORD STORAGE & SECURITY

Records must be stored in a secure environment that protects them from damage, deterioration, or unauthorized access. Acceptable storage methods include:

- Secure file storage systems
- Protected electronic databases
- Controlled-access records storage facilities

Backup procedures must be in place for electronic records.

12. RECORD DESTRUCTION

At the end of the required retention period, records may be destroyed in accordance with applicable federal and state requirements.

Records containing confidential information must be destroyed using secure methods such as:

- Shredding
- Secure electronic deletion
- Certified document destruction services

Records may not be destroyed if they are subject to ongoing audit, litigation, claim, or monitoring review.

