

1600POL Records and Documentation Retention (Rev3)

Effective Date: July 2020

Last Modified: December 2024

The Olympic Workforce Development Council follows state and federal laws and regulations to ensure Workforce Innovation and Opportunity Act (WIOA) Title I financial and program records meet the provisions of *WIOA Policy 5403 Records Retention and Public Access*, and the Washington State Archive Local Government Common Records Retention Schedule (CORE).

- 1. WIOA Title I contract, agreements, or any other award, including financial, statistical, and property records and documentation retention per WIOA Policy 5403 Records Retention and Public Access with a 6-year retention schedule.**
 - a. Final expenditure report (closeout) submittal initiates retention period.
 - i. Exception: if litigation, audit, or claim involving the contract begins, the retention begins on the date of resolution. All records beyond the required three (3) or six (6) years if any litigation or audit is under way or a claim is instituted involving the grant or agreement covered by the records. The records must be retained for at least six (6) years after the litigation, audit, or claim has been resolved.
 - b. Non-expendable property records have a 3-year retention period after final disposition of property.
 - c. Complaints and actions taken have a 3-year retention period from the date of resolution.
- 2. WIOA Title I retain all program and data validation records pertinent to applicants, registrants, eligible applicants/registrants, participants, employees, and applicants for employment are maintained per WIOA Policy 5403 Records Retention and Public Access and have at least a 6 -year retention period after the end of the fiscal year**
 - a. Subrecipients and contractors house and maintain participant files under the laws and regulations of specific federal, state, and local law requirements.
- 3. OWDC contractors and subrecipients are required to manage the cost of storage and keep records and documents in a manner to prevent loss or damage.**
 - a. Storage costs shall be entered as a liability, requiring payment to the vendor.
- 4. WIOA Title I records and documents will be made available in the case of audits, monitoring, and/or examination by the Olympic Consortium Board (OCB), Olympic Workforce Development Council (OWDC), U.S. Department of Labor (DOL), or the State of Washington.**
 - a. This right also includes timely and reasonable access to Contractor's and subcontractor's personnel, for the purpose of interviews and discussions related to such documents.
 - b. Subrecipient General Ledger will be made available upon request.
- 5. The statewide Management Information System (MIS) houses all program participant records and documentation per 1611TSK Digital Documentation procedure.**
 - a. If specific documentation is not obtained or required, case notes within the participant record must explain why documentation is missing or unnecessary.
 - b. Records retained beyond the mandatory retention period are subject to audit and/or review.
- 6. Confidential files are defined as** medical or legal documentation which includes information covered under HIPPA or PPII information required to determine WIOA program eligibility or participation in training services or outcome "Medical Exit" verification that is not entered into MIS.
 - a. Confidential (medical/legal) information must be kept in physical paper form in subrecipient designated locked file cabinet.

- i. Files are required to be labeled with case management ID number, last name (at least), and date of exit (to verify retention dates).
 - ii. A dated note/letter of staff explanation for keeping information.
 - iii. Participant medical information has a three-year retention after date of exit and will be kept in confidential file cabinet until retention is met (see also *Management of Medical and Disability Related Information, WIN 0023(Change 2)*).
- 7. Protection of personally identifiable information (PII) will be housed per 1601POL Protection of Personally Identifiable Information policy.**
- 8. The OWDC acknowledges subrecipient use of a participant “Working File”.**
- a. Working files are defined as physical documents not yet uploaded into applicable TouchPoints (TP). This may include:
 - i. Missing pages or documentation
 - ii. Missing or incomplete information
 - iii. Documents waiting signature (application, purchase orders, etc.)
 - b. Once documentation is uploaded into case management system, subrecipients are required to destroy Working File and all applicable documentation.
 - c. All working file documentation is subject to audit and/or review (per #4 above).
- 9. Once a record or document reaches retention date (Six-years after exit date), the record is required to be logged (see below) per CORE destruction procedure and destroyed.**
- a. Destruction logs are required, have an indefinite retention period, and are to be kept in Confidential file cabinet and must include:
 - i. Case management participant ID number
 - ii. Last name and first initial
 - iii. Date of exit (to verify retention was met)

References

Financial Transactions – General, Washington State Archive Local Government Common Records Retention Schedule

[CORE, GS2011-184 Rev3](#)

Management of Medical and Disability Related Information, Washington Information Notice (WIN) [0023 \(Rev2\)](#)

OWDC Digital Documentation Procedure 1611TSK

OWDC Protection of Personally Identifiable Information Policy 1601POL(Rev 2)

Records Retention and Public Access, [Workforce Innovation and Opportunity Act Policy 5403 \(Rev2\)](#)

1611TSK Digital Documentation Uploading

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The Olympic Workforce Development Board (LWDB) must maintain documentation to ensure credibility of eligibility determinations and support Data Element Validation requirements in alignment with this policy and *WorkSource System Policy 1003 (Rev6) Data Element Validation and 1600POL Records and Documentation*.

All physical documentation is required to be uploaded into the stateside Management Information System (MIS) location. If specific documentation was not required or obtained case notes are required to explain why documentation is missing or unnecessary.

TRIGGER: Case worker receives documentation from participant, training/school, support service, or internal accounting department.

TARGET: All participant documentation uploaded correctly into MIS.

OWDC uses an online application delivery system, provided by Kitsap County's Cognito Forms. Deletion of all entries is performed by OWDC staff on a quarterly basis.

OWDC Internal Deletion Procedure/Task:

1. Log into Cognito Forms → OWF
 - a. Hover mouse over one of the application
 - i. Click Entries
 - b. List of entries will populate, click on check box at top to select all.
 - c. Click Actions
 - i. Export → All Fields
 - ii. Excel file will download
 1. Email file to supervisor
 - d. Back in Cognito → Click Actions
 - i. Delete
 - ii. Delete Entry window → Select Delete
 - e. Complete steps for each application
 - f. Log out of Cognito

Immediately upon receiving all WIOA eligibility documentation.

1. Separate documentation by type.
2. Scan documentation to computer.

(At computer) Rename documentation using naming convention. **NAMING CONVENTION:** Participant last name, first name initial, document name, date (ex. SmithJ WIOA App 2020SEPT20).

3. Upload documents into corresponding TP in ETO.
4. Shred physical documents (*or* follow subrecipient policy for file documentation requirements).
5. Delete documentation on computer.

Uploading documentation into ETO TP's.

TouchPoint	Documents:
WIOA Eligibility Application	<p>All application fields need to be completed; the following are document upload fields:</p> <p>Demographics Tab:</p> <ul style="list-style-type: none">• Date of Birth Verification Driver's License or Birth Certificate• Legally Entitled to Work Attachment I9 documentation <p>Selective Service Information Tab</p> <ul style="list-style-type: none">• Selective Service Printout <p>Veteran Information Tab</p> <ul style="list-style-type: none">• Veteran Verification Attachment DD-214 <p>Employment Tab</p> <ul style="list-style-type: none">• Employment Attachment• Dislocated Worker Verification <p>Income Information Tab</p> <ul style="list-style-type: none">• TANF Verification Attachment• Other Public Assistance• SSI/SSCI Attachment

Program Enrollment	Barriers Tab <ul style="list-style-type: none"> • Basic Literacy Deficiency Verification Complete the Program Enrollment
Individual Participant Plan	Fill in completely YOUTH – Goals Tab <ul style="list-style-type: none"> • Upload Paper Version of Plan • ISS or IEP • Objective Assessment
Individual Training and Support Service	<i>Development of Individual Employment Plans (2.0)</i> Upload Files <ul style="list-style-type: none"> • Signed and dated: Equal Opportunity Notice of the Right to File Discrimination Complaint Notice of Right to file WIOA Complaint and Grievance Data Sharing Notice • WIOA Enrollment Application W/financial workshet • Labor Market Information-Occupations In-Demand (OID) (where applicable, i.e., Dislocated Worker eligibility requires OID data). • <i>*Program Enrollment Case Notes</i>
TRAINING SERVICES	Upload Files where applicable and/or upon completion of service. <ul style="list-style-type: none"> • Eligible Training Provider (Career Bridge Printout) • Employer Contract • Course Schedule • Commissioners Approved Training • Individual Training Account • Valid and Applicable correspondence • Invoice / Receipt • Purchase Order/ A19 • Time Sheets
SUPPORT SERVICES	Upload Files <ul style="list-style-type: none"> • Invoice/Receipt • A19 or Purchase Order • All supporting documentation of services provided.
CAREER SERVICES	Upload Files <ul style="list-style-type: none"> • Any career services documentation
MEASURABLE SKILLS GAINS <i>Tests and Measures</i>	Upload Files <ul style="list-style-type: none"> • Progress Reports • Transcriptions • Report Cards • Diplomas • Certifications

OUTCOMES

Upload Files

- All applicable outcome documentations

Uploaded Documents

All other documentation not listed above.

REFERENCES

Data Element Validation, [WorkSource System Policy 1003 \(Rev6\)](#)

OWDC Records and Documentation [1600POL](#)