



A proud partner of the [AmericanJobCenter](#) network

POLICY # 25

Title:	Records Retention	
Program:	Workforce Innovation and Opportunity Act	
Effective:	July 1, 2023	
Revision #:	1	Original policy date: October 28, 2016

Purpose: To provide guidelines and procedures for the retention of records and disposal of WDBMOV documents, both paper and electronic forms.

References Workforce Innovation and Opportunity Act 185(a) 2CFR Part 200.333, OMB Circular A-110.53.

Background: The WDBMOV releases a Records Retention policy to ensure accountability for records resulting from WIOA and other activities and services funded by the WDBMOV. Record retention is governed by various rules and guidelines depending on the type of record.

Policy: This policy applies to all financial and programmatic records, supporting documents, statistical records, and other records of grantees or sub-grantees which are required to be maintained by the terms of program regulations or the grant agreement, or otherwise reasonably considered as pertinent to program regulations or the grant agreement.

Records Retention

The WDBMOV, fiscal agent and any sub-recipient and contractor of WIOA funds shall:

1. Retain all records pertinent to the grant, grant agreements, interagency agreements, contracts or any other award, including financial, statistical, property, applicant or registrant records, cost allocation plans, audit reports, and supporting documentation, for a period of at least (5) five years after submittal of the final expenditure report (closeout) for that funding period to the awarding agency.
2. Retain all records of non-expendable property for a period of at least (5) five years after final disposition of property.
3. Retain all records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminees, employees and applications for employment for a period of not less than (5) five years from the close of the applicant program year.
4. Retain records regarding complaints and actions taken on the complaints for a period of not less than (5) five years from the date of resolution of the complaint.

5. Retain all records beyond the required (5) five years if any litigation or audit is begun or claim is instituted involving the grant or agreement covered by the records. The records shall be retained for an individual (5) five years after the litigation, audit or claim has been resolved.

If documents are in question, they should be kept for a minimum of (7) seven years.

The following documents should be kept permanently:

- 1) Board Minutes
- 2) Bylaws

Fiscal Documents

The WDBMOV Fiscal agent is responsible for maintaining appropriate record retention for any financial documents.

Records Disposal

Record disposal should be done by shredding in house or with a reputable document shredding company. No records should be disposed of without the prior approval from the WDBMOV Executive Direction, or designated staff. When disposal approval has been received, documents must be shredded.

Acceptable Record Format

Scanned, photocopied or similar methods may be substituted for the original records if they are preserved with integrity.

Action: American Job Centers working with individuals from WDBMOV will make customers aware of this policy, as well as, collaboratives and entities providing service to our region.

Expiration Date: This policy shall remain in effect until revised or canceled by the Workforce Development Board Mid-Ohio Valley.