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1401 RECORD RETENTION

Pinal County Workforce Development Board (PCWDB) staff, Workforce Innovation and Opportunity Act (WIOA) Title I-B service providers, the One-Stop Operator and other sub recipients are responsible for complying with record retention requirements set forth in this policy and are in accordance with the Workforce Innovation and Opportunity Act (WIOA) and other applicable federal and state laws and regulations.

For purposes of this policy, “records” are defined as all programmatic and fiscal hard-copy and electronic documents that pertain to participants and employees of WIOA Title I-B programs.

PCWDB staff and Workforce Innovation and Opportunity Act Title I-B service providers, the One-Stop Operator and other sub-recipients of WIOA Title I-B federal funds must retain records to ensure program integrity and accountability resulting from activities, services, or employment associated with WIOA Title I-B funds. Record retention is necessary to meet legal requirements documenting compliance with governing laws, rules, regulations, relevance in potential future litigation, as well as historic importance.

1402 AUTHORITY

- A. Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128) Section 185;
- B. WIOA Final Regulations 29 CFR 38.43, 29 CFR 97.42;
- C. Arizona Department of Economic Security (DES) Uniform Terms and Conditions and Special Terms and Conditions (Pinal County contract with DES);
- D. Arizona Revised Statutes (A.R.S.) 35-214, 41-151.15;
- E. Arizona Revised Statutes 41-1967; and
- F. Uniform Guidance 2 CFR 200.329, 200.333-337.

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1403 RECORD RETENTION PERIODS

PCWDB staff, WIOA Title I-B service providers, the One-Stop Operator and other sub recipients must maintain all records in electronic format that are legible and accessible, including email, for at least the minimum periods outlined below:

- A. Records of applicants, registrants, eligible applicants/registrants, and participants must be retained for a minimum of three years after exit from the program. This includes eligibility documents, medical documentation, assessments, employment plans, records of activities, documentation of credentials, case notes, sign-in sheets at ARIZONA@WORK Pinal County Job Centers and all other records that indicate participation with a WIOA Title I-B program.
- B. Records of terminees, employees, and applicants for employment administering a WIOA Title I-B program must be retained for a minimum of three years. This includes eligibility documents, assessments, documentation of credentials, sign-in sheets, employee records and all other records that indicate application or employment with an ARIZONA@WORK Pinal County service provider.
- C. Records that are related to a discrimination complaint, including actions taken on the complaint, must be retained for a minimum of three years from the date of final action related to the resolution of the complaint.
- D. Records that are related to any compliance review that uses WIOA Title I-B funding (programmatic, fiscal, equal opportunity, One-Stop Certification, Eligible Training Provider List (ETPL), etc.) must be retained for a minimum of three years from the date of final report.
- E. Financial records, statistical records, accounts, reports, files, and supporting documents, agenda and minutes of open meetings, and all other records pertinent to WIOA Title I-B funds or contract relating to the furnishing of goods, equipment, labor, materials, or services must be retained for a minimum of three years from the submission of final financial expenditure report.
- F. Records that are related to training providers that apply for or are listed on the ETPL must be retained for a minimum of three years. This includes

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applications, Training Provider Credential Checklist, performance reports, monitoring reports, and communication with training providers, including denial letters and emails.

- G. When records having one retention period cannot be separated from records having a longer retention period, records must be retained for the longer retention period.

1404 RECORD RETENTION REQUIREMENTS

- A. WIOA Title I-B service providers must upload source documents as evidence of work performed and costs incurred into Arizona’s web-based labor exchange, case management, and reporting system – Arizona Job Connection.
- B. When a WIOA Title I-B service provider is unable to retain required WIOA Title I-B participant and financial records, or the award for service is terminated by the PCWDB, the records must be transferred to the PCWDB or to a new service provider, as directed by the PCWDB. Records must be transmitted within the time period stated by the PCWDB and must be properly labeled and filed in an acceptable condition for storage.
- C. When hard copy files are maintained, PCWDB staff, service providers, the One-Stop Operator and other sub recipients must ensure there is appropriate storage space to maintain security and confidentiality.
- D. All documentation pertaining to medical information must be maintained separately from main program files to ensure confidentiality. Access to medical information must be limited to staff on a “need to know” basis.
- E. Only “inactive” records may be stored at the Pinal County Economic and Workforce Development Department Office. “Inactive” records means records that are not accessed on a regular basis or required for current use. “Inactive” records may be stored at the Pinal County Economic and Workforce Development Department Office until their record retention periods have been met. Once the retention periods are met, these records must be destroyed.
- F. PCWDB staff must review files/records in storage on a regular basis of, at a minimum, at least once a year to determine if the retention period has been

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met. Files/records determined to have met the retention period must be destroyed.