

# Northwest Workforce Investment Board

## ADMINISTRATIVE PROCEDURES

Issuance No: 23  
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Subject: Record Retention Policy

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### **Definition:**

29 CFR 95.53 establishes guidelines for record retention for institutions of higher education, hospitals, and other non-profit and commercial organizations. These requirements apply equally to both recipients/grantees and subrecipients/ subgrantees, and indicate that records must be retained for three (3) years following the date on which the expenditure report containing the final expenditures charged to a PY's allotment or a grant is submitted to the ETA. The requirements apply to financial records, supporting documents, statistical records, and all other records pertinent to award. Records are to be retained beyond the prescribed period if any litigation or audit has begun, or if a claim is instituted involving the grant or agreement covered by the records. In these instances, the records must be retained until resolution of the litigation, audit or claim and final action is taken; or until the end of the regular three-year record retention period, whichever is later [29 CFR 97.42(b)(2) and 29 CFR 95.53(b)(1)].

The Northwest Workforce Investment Board will adhere to the requirements outlined above to include all records for WIA Title I and CAP funded programs.

### **Custody of Records:**

To avoid duplicate record keeping, subcontractors will retain records that are required for joint use (recipients/grantees or subrecipients/subgrantees). In the event the WIB identifies a need for such records, during the prescribed period of time, the WIB will have the right to transfer those records to its custody. When the records are transferred to or maintained by the WIB, the retention requirement does not apply to the subcontractor that relinquished its records.

Any deviation from the three-year retention requirement must receive prior written approval from the Division of Workforce Development. If records are unintentionally disposed through acts of man or God prior to the three year period, the WIB and Division of Workforce Development must be notified immediately.