



# ADMINISTRATIVE POLICIES/PROCEDURES

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Subject: Record Retention Policy

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Record retention describes the length of time a document or a record will have to be maintained as an active document or record. It also provides guidelines on the final disposition of documents or records after the end of the mandatory retention period.

## **Definition**

Uniform Guidance 2 CFR 200.334 indicates “financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a sub-recipient.”

Records and/or documents may include but are not limited to, paper documents, e-mails, web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files, etc.

The records and/or documents must be retained for a period of three (3) years following the date on which the final expenditure report was submitted for any allotment or grant year. The three (3) year retention period assumes no audit/litigation problems would require an extended retention period. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action is taken or until the end of the regular three 3-year record retention period, whichever is later.

Records for real property and equipment acquired with Federal funds must be retained for a period of three (3) years after final disposition of the property or equipment.

Records must be stored and retained in a manner that will preserve integrity and admissibility as evidence. Adequate measures must, therefore, be in place to forestall the defacing of records. The WDB will adhere to the requirements outlined above to include all records for WIOA Title I and WDB-funded programs.

## **Custody of Records**

To avoid duplicate recordkeeping, sub-recipient(s) will retain records that are required for joint use. In the event the WDB identifies a need for such records, during the prescribed period of time, the WDB will have the right to transfer those records to its custody. When the records are transferred to or maintained by the WDB, the three-

year retention requirement does not apply to the sub-recipient that relinquished its records.

If any records are unintentionally disposed of through acts of man or God before the three-year period, the WDB must be notified immediately. The WDB will request approval from DHEWD before any records are destroyed.

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