



WIA TITLE I-B PROGRAM MANAGEMENT POLICIES AND PROCEDURES

MEMORANDUM #05-19

To: All Subrecipients

Subject: Records Retention and Access

Effective Date: September 30, 2005

A. BACKGROUND

In conformance with Washington State Policy Number 3415, Records: Retention and Public Access, for Title I-B of the Workforce Investment Act, the Snohomish County Workforce Development Council (WDC) has developed this policy and these procedures for retention of and access to records.

B. POLICY

The Snohomish County Workforce Development Council requires all subrecipients to retain and provide access to records of all fiscal and program activities funded under WIA as outlined below.

I. Records Retention

Each subrecipient shall:

- (1) Retain all financial, statistical, property, applicant, and participant records and supporting documentation pertinent to its subcontract(s) for a period of at least three (3) years after submittal of the closeout report for the subcontract(s) to the WDC.
- (2) Retain all records of non-expendable property for a period of at least three (3) years after final disposition of the property.
- (3) Retain all records pertinent to applicants for program services and participants for a period of not less than three (3) years after submittal of the closeout report to the WDC.
- (4) Retain all records of applicants for employment for a period of not less than three (3) years after conclusion of the relevant hiring process.
- (5) Retain all employee records for a period of not less than three (3) years after the employee leaves the employment of the subrecipient.
- (6) Retain all records beyond the three (3) year period if any litigation or audit has begun or after a claim is instituted involving the subcontract covered by the records. In such

instances, the records shall be retained for an additional three (3) years after resolution of the litigation, audit, or claim.

In instances where an entity ceases to be a subrecipient of the WDC, the records shall be retained by the Site Operator or, in instances where the Site Operator ceases to be a subrecipient, the records shall be transferred to the new Site Operator. In instances where there is no Site Operator (e.g., in-school youth programs) the records shall be transmitted to and retained by the WDC or an entity designated by the WDC as the ongoing provider of services.

II. Access

Personal records of WIA registrants are private and confidential and will not be disclosed to the public. Personal information may be made available to WorkSource partners on a selective basis consistent with a given participant's signed Consent Form. In addition, this information is to be made available to representatives of entities having responsibilities under WIA including:

United States Department of Labor
State of Washington
Snohomish County
Snohomish County Workforce Development Council

Additional conditions affecting access include:

- (1) A given WIA participant has access to all information pertaining to her/himself unless the record or information is exempted from disclosure.
- (2) The names of WDC staff and subrecipient staff in positions funded by WIA, in part or in whole, are a matter of public record. Other information pertaining to these employees shall be made available to the public in the same manner and to the same extent as such information is made available for staff not funded by WIA.
- (3) Public agencies responsible for financial and/or program activities under WIA will have public records systems in accordance with RCW 42.17.250. Nongovernmental agencies with such responsibilities will have public records systems which comply with the spirit and intent of RCW 42.17.250.