



WIOA Title I Participant Records Disposal Guidelines

**Procedure
Number:**

1150a

Effective Date: June 14, 2023

Always review WFS Policy #1150: Records Retention & Public Access, and the most current revision of State Policy 5403 prior to any consideration regarding disposal of participant records. It is the responsibility of any entity required to maintain and manage records to review and understand these policies. The synopsis below is intended as a guide and does not replace any official policy. WFS Policy 1150: Records Retention & Public Access supersedes this document in the event of any contradiction or conflict.

Records are the responsibility of the subrecipient agency under whom the participant was being served at the time of their program exit.

IMPORTANT: On June 16, 2022, Employment Security Department issued [WIOA Title I Policy 5403, Revision 1](#). This revision, among other things, increased the required retention of participant records from three (3) years to six (6) years.

Any participants exited 7/1/2018 or later will fall under the guidelines of Policy 5403, Revision 1 and must be retained for 6 years past the reporting period for the program year in which they exited. The reportable period of performance is the last day of the program year during which the participant ended participation in the program, as documented in the Efforts-to-Outcomes (ETO) database. Check ETO to determine when participant's enrollment ended.

Below are two examples to consider.

A participant who falls under the guidelines of the 3-year records retention policy:

- The participant enrolled into the program on 02/02/2015.
- **The participant exited from the program on 07/05/2016.**
- The participant's outcome was reportable through the end of the Program Year during which they exited, which is determined to be 06/30/2017.

- WFS records retention policy at the time of exit is 3 years after reporting period – **so it is eligible for shredding any time after 06/30/2020.**
- Files must be stored securely until it is appropriate for them to be destroyed any time after 6/30/2020.

A participant who falls under the guidelines of the 6-year records retention policy:

- A customer enrolled into the program on 02/02/2018.
- **The participant exited from the program on 07/05/2018.**
- The participant’s outcome was reportable through the end of the Program Year during which they exited, which is determined to be 06/30/2019.
- WFS records retention policy updated during the original retention period for this file to now require 6 years - so it is **eligible for shredding any time after 06/30/2025.**
- Files must be stored securely until it is appropriate for them to be destroyed any time after 06/30/2025.

*NOTE: Any participant whose reportable outcome period is 06/30/2019 or later will fall under the 6-year records retention requirement.

Disposal Date Table

Participant Exit Date	Reportable Date	Retention Years	Disposal Date
07/01/2015 - 06/30/2016	06/30/2016	3 years	07/01/2019
07/01/2016 - 06/30/2017	06/30/2017	3 years	07/01/2020
07/01/2017 - 06/30/2018	06/30/2018	3 years	07/01/2021
07/01/2018 – 06/30/2019	06/30/2019	6 years	07/01/2025
07/01/2019 – 06/30/2020	06/30/2020	6 years	07/01/2026
07/01/2020 – 06/30/2021	06/30/2021	6 years	07/01/2027
07/01/2021 – 06/30/2022	06/30/2022	6 years	07/01/2028
07/01/2022 – 06/30/2023	06/30/2023	6 years	07/01/2029