

**POLICY #:** A-02  
**Record Retention, Maintenance, Disposition, Disclosure  
and Confidentiality**



**Clackamas  
Workforce  
Partnership**

**ISSUED:** January 17th, 2013  
May 17, 2018

**PURPOSE:**

To establish the requirement for Clackamas Workforce Partnership (CWP) and subrecipients to maintain and retain records of all fiscal and program activities funded under the Workforce Innovation and Opportunity Act (WIOA) and other grant funds.

**REFERENCES:**

- 2 CFR 200.333-337
- 29 CFR 38.41-45
- 29 CFR 97.42
- WIOA Section 185(a)

**DEFINITIONS:**

**Retention Period:** The retention period for the records of each funding period starts on the day the grantee or subgrantee submits to the awarding agency its single or last expenditure report for that period.

**Final Expenditure Report:** Submitted with the annual settlement for the program year in which the final expenditures for the funding period are reported.

**POLICY:**

CWP and subrecipients will incorporate into their management systems the following procedures for the management of all records.

1. Retain all records and documents pertinent to the grants, grant agreements, interagency agreements, contracts or any other award, including financial, statistical, or other pertinent records, and supporting documentation, for a period of at least three (3) years after the original submittal by the grantee of the final expenditure report (closeout) for that funding period to the awarding agency;
2. Retain all records of non-expendable property for a period of at least three years after final disposition of property;
3. Retain indirect cost records such as computations or proposals, cost allocation plans, and supporting documentation for three years from the date the indirect cost rate package is submitted for negotiation. If not submitted for negotiation, the three-year period identified in (1) above shall apply;

4. Retain all records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment for a period of not less than three years from the close of the applicant program year. Such records must be maintained as whole record system;
5. Retain records regarding complaints and action taken on the complaints for a period of not less than three years from the date of resolution of the complaint;
6. Retain all records beyond the required three years if any litigation or audit has begun or a claim is instituted involving the grant or agreement covered by the records. The records shall be retained until the litigation, audit, or claim has been resolved or the required three years, whichever period is longer.

In the event that subrecipients are unable to keep their records, CWP will take custody and be responsible for the maintenance and retention of the records of any fiscal agent or subrecipient.

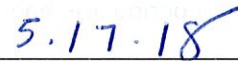
#### **Disposal**

No records addressed in this policy shall be disposed of without instruction from or approval of CWP. CWP will provide instructions and timelines for disposing of records. Any records that are confidential in nature, including participant records, must be shredded, or similarly destroyed. Non-confidential records may be recycled.

Approved:



Clackamas Workforce Partnership Chair



Date