

Mass Workforce Issuance

Workforce Issuance No. 07-57

☒ **Policy** ☐ **Information**

To: Chief Elected Officials
Workforce Investment Board Chairs
Workforce Investment Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DCS Associate Directors
DCS Field Managers

cc: WIA State Partners

From: David W. Mackley, Director
Department of Workforce Development

Date: August 24, 2007

Subject: **Record Retention Requirements**

Purpose: To provide updated policy guidance to Local Workforce Investment Boards, One-Stop Career Center Operators and other local workforce investment partners with respect to record retention requirements and to ensure that all sub-recipient and grantee financial and programmatic records are maintained in compliance with applicable federal and state laws, regulations and policies; and that these records be accessible to authorized Federal and State staff, and verifiable for monitoring, reporting, audit and evaluation purposes.

Background: The Department of Workforce Development (DWD) must ensure that local workforce systems are knowledgeable of the requirements for retention of all records pertinent to all grants awarded, and contracts and agreements entered into with respect to services and activities performed under the Workforce Investment Act of 1998. This requirement applies to all federal funds issued by DWD, including financial, civil rights, statistical, property and participant records and supporting documentation of sub-grantees.

Previous guidance was delineated through multiple issuances. This issuance consolidates record retention policy requirements in a single document and

replaces: Policy 00-11 (2/25/2000); Issuance 00-23 (5/31/2000); WIA Communication No. 03-03 (3/5/2003) and WIA Communication No. 04-23 (3/31/2004).

Policy: Records must generally be retained for a period of 3 years. Specific requirements are described in Attachment A. All sub-recipients of Federal grants provided by DWD must assure that local policies and procedures regarding the retention of pertinent records comply with the guidance provided, herein. Any provisions contained in any other applicable laws and regulations shall apply, even if they are not explicitly stated in this policy. Nothing in this policy shall be construed to contradict prevailing laws and requirements for records retention that may be *more* restrictive than the federal requirements.

Action

Required: Please review all local policies and procedures regarding record retention to assure compliance with the requirements described in this issuance. Please also assure that all local workforce investment partners, sub-recipients and all appropriate staff are aware of the retention requirements described in this issuance.

Effective: Immediately

References: OMB Regulations at 20 CFR 95.53 and 20 CFR 97.42; WIA Regulations at 20 CFR 652, et al; and WTW Regulations at 20 CFR 645; Massachusetts General Laws c.66, s.10; and MG.L.c.4, s7(26).

For all sub-recipients of federal grants, the general fiscal and administrative requirements which apply are those delineated in OMB Circular A-102, "Uniform Administrative Requirements for Grants and Cooperative Agreements With State and Local Governments" and OMB Circular A-110, "Uniform Administrative Requirements for Grants and Cooperative Agreements With Institutions of Higher Education, Hospitals and Other Non-Profit Organizations", as applicable.

Inquiries: Please email all questions to PolicyQA@detma.org. Also, indicate Issuance number and description.