

MASSACHUSETTS WORKFORCE DEVELOPMENT SYSTEM

Mass Workforce Issuance

100 DCS 03.104

☒ **Policy** ☐ **Information**

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

cc: WIOA State Partners

From: Alice Sweeney, Director
Department of Career Services

Date: June 7, 2016

Subject: **Record Retention Requirements**

Purpose: To provide updated policy guidance to Workforce Boards, One-Stop Career Center Operators and other workforce 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 Executive Office of Labor Workforce Development (EOLWD) 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 Innovation and Opportunity Act (WIOA). This requirement applies to all federal funds issued by EOLWD, including financial, civil rights, statistical, property and participant records and supporting documentation of sub-grantees.

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 EOLWD 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. For example, all written records required by Chapter 30B must be maintained for a period of six years from the date of final payment under the contract. 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 partners, subrecipients and all appropriate staff are aware of the retention requirements described in this issuance.

Effective: Immediately

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

Attachment: A. Record Retention Requirements

References: 2 CFR Parts 200.333 – 200.337
2 CFR 200, Appendix II to Part 200
Federal Freedom Act (5 U.S.C.552)
Massachusetts General Laws (M.G.L.) c.66, s.10 and M.G.L. c.4, s.7(26)