

Policy # 12	
SUBJECT:	Record Retention and Disposal
DATE ISSUED:	July 24, 2018
DATE EFFECTIVE:	July 1, 2016
REVISION DATE:	September 17, 2021

REFERENCES: WIOA 185(a), CFR 200.333

ACTION: This policy applies to all financial and programmatic records, supporting documents, and other records of grantees or sub grantees which are required to maintained by the terms of the program requirements or the grant agreement.

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report for the grant period.

The only exceptions are the following:

- a. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- b. When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- c. Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- d. When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3- year retention requirement is not applicable to the non-Federal entity.
- e. Records for program income transactions after the period of performance. In some cases, recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- f. Indirect cost rate proposals and cost allocations plans.

After 3 years, records will be maintained by WIB-KC for a minimum of an additional 4 years. After 7 years, all records will be shredded or otherwise appropriately disposed.