



<b>Title:</b>	Custody of Records Policy	<b>Policy #:</b>	11
<b>Effective Date:</b>	August 20, 2015	<b>Revision Date:</b>	January 10, 2020

**Purpose:**

To establish a procedure for the transfer and possession of Workforce Innovation and Opportunity Act (WIOA) programmatic files for the Piedmont Workforce Network (PWN).

**Policy:**

Active WIOA Participant Files

WIOA participant files contain personally identifiable information including Social Security Numbers, names, addresses, and contact information for participants. Because of this, it is of utmost importance that files be kept in secure manner to protect this information. WIOA participant files should be kept in a cabinet or drawer system that can be locked and are only accessible by WIOA Program Operators or PWN staff.

Transport of Active WIOA Participant Files

If the need arises to transport the WIOA participant files to meetings in other locations within the region, every effort should be made to transport these files in a secure manner. Files should be returned to a locked cabinet within 24 hours. Files should not be stored in personal or company owned vehicles or stored in other locations that are not official One Stop Centers within the region.

Transferred Files

From time to time, participants move out of the region or into the PWN region from other areas. When this occurs, it is sometimes possible to transfer the file so that services can continue to be provided. All transfers of files must be coordinated and approved by the PWN Assistant Director. Once the transfer has been approved, the PWN Assistant Director will communicate with officials at the Virginia Community College System to ensure that the transfer occurs in the Virginia Workforce Connection for performance and record accuracy.

Transition of Operator

In the event that the WIOA Program Operator changes, PWN staff must review and monitor all files prior to the transition to correct errors and review for eligibility issues. If eligibility discrepancies are documented, the WIOA Program Operator that enrolled the participant will be responsible for all disallowable costs. On the day of contract termination, PWN staff will be required to take custody of all active participant files using Attachment A: Custody of Files Transfer Document. Afterwards, PWN staff will transfer custody to the new WIOA Program Operator using Attachment A.

### WIOA Follow-up Files

While files are in active follow-up, they will be kept in the same manner as active WIOA participant files. The follow-up files should be kept in a cabinet or drawer system that can be locked and are only accessible by the WIOA Program Operator and PWN staff. The location of these files should be within the PWN region.

Once the WIOA participant has completed the follow up process, they can be transported for storage to another facility, but accurate records must be maintained which shows the state ID of the participant, the location of the file, the last date of follow-up, the date the file should be destroyed, and the date that the file was destroyed (See Attachment B: File Maintenance Spreadsheet).

Physical copies of the programmatic files will be kept for three (3) years after the date of last follow-up activity.

After three (3) years, the WIOA Program Operator will take inventory of those files that have met the retention standards and record which files need to be destroyed. The Program Operator must request from PWN staff permission to destroy the files as noted on the File Maintenance Spreadsheet.

