



POLICIES AND PROCEDURES

POLICY TYPE:	Finance Policy #9, Records Retention
EFFECTIVE:	July 1, 2022
REVISED:	July 1, 2024

PURPOSE

To communicate the requirements to Lane Workforce Partnership (LWP) staff regarding the time frame associated with records retention. It is the intent of LWP, through this policy, to comply with all applicable federal and state laws and regulations, as they may change from time to time.

REFERENCES

- Code of Federal Regulations Title 2 Grants and Agreements
- Higher Education Coordinating Commission Office of Workforce Investments Policy: Financial Management and Administrative Standards (3/27/2024) Revised Policy

POLICY

Lane Workforce Partnership (LWP), a nonprofit and direct Federal recipient, sub recipient and pass through entity will retain all records of financial, statistical and program related activities funded through federal, state, and local awards for a period of eight years following the end of the fiscal year. The eight (8) year retention period is intended to satisfy the Federal requirements in 2 CFR 200; the requirements of the State of Oregon, Higher Education Coordinating Commission Office of Workforce Investments Policy: Financial Management and Administrative Standards (3/27/2024) Revised Policy; and all other legally binding contractual agreements.

PROCEDURES

Retain all records pertinent to the grant, 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 eight (8) years after the end of the fiscal year. The only exceptions are the following:

- a) If any litigation, claim, or audit is started before the expiration of the 8-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 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) Retain all records of non-expendable property for a minimum of eight (8) years from the end of the fiscal year disposed in.
- d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity the 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) Retain indirect cost records such as computations, proposals, cost allocation plans and any other supporting documentation for which a particular group of costs is chargeback (such as computer usage chargeback rates or composite fringe benefit rates), for a period of eight (8) years from the date the indirect cost rate was submitted for negotiation. If not submitted for negotiation, the eight (8) year period identified in the above shall apply.
- g) Retain all records pertaining to applicants, registrants, eligible applicants/registrants, participants for a period of not less than eight (8) years from the close of the applicant fiscal year. Records will be maintained as whole record systems.
- h) Retain all records pertaining to employees and the employment process as prescribed by Federal and State laws, which may change from time to time.
- i) Retain all records of complaints and actions taken of complaints for a period of not less than eight (8) years from the date of resolution of the complaint.
- j) In the event any sub recipient is unable to keep their records, LWP will take custody and be responsible for the maintenance of the records of any fiscal agent or sub recipient in accordance with the eight (8) year policy outline above.

RESPONSIBILITIES

This policy applies to all LWP grant funded activities and staff. No records addressed in this policy shall be disposed of without instruction from or approval by Lane Workforce Partnership (LWP). Lane Workforce Partnership will provide instructions and timelines for disposing of records. Additionally, prior to any disposal, LWP staff will check the Higher Education Coordinating Commission, Record Retention Schedule for Federal Funds – WIOA Title I, listed on the www.wioainoregon.org website under Policy and Guidance.

ISSUED

Revised Date: July 1, 2024



Tiffany Cink, Chief Operating Officer