

CATAWBA WIA INSTRUCTION PY04-003

TO: All PY'04 WIA Grantees

SUBJECT: Record Retention

ISSUANCE DATE: July 28, 2004

EFFECTIVE DATE: Immediately

EXPIRATION DATE: Indefinite

All items required for federal reporting on WIA participants are electronically transmitted to the Department of Labor for **three consecutive years**, beginning with the year the participant exits the WIA program. For the PY 2003 WIA Annual Report, participants with Exit Dates from April 1, 2003 through March 31, 2004 will be reported in the count for Total Exiters. To ensure that all required hard copy case files for participants are maintained for a time period sufficient to cover data validation and audits, these records must be maintained for **five years**. **Therefore, hard copy case files, including WIA eligibility case files, for all WIA participants who exited from WIA from April 1, 2003 through March 31, 2004 must be maintained until March 31, 2009.** Please refer to the chart below for additional information.

Program Year	Exit Dates	Destroy Date
PY 2000	July 1, 2000-June 30, 2001	June 30, 2006
PY 2001	July 1, 2001-June 30, 2002	June 30, 2007
PY 2002	July 1, 2002-March 31, 2003	March 31, 2008
PY 2003	April 1, 2003-March 31, 2004	March 31, 2009
PY 2004	April 1, 2004-March 31, 2005	March 31, 2010
PY 2005	April 1, 2005-March 31, 2006	March 31, 2011

Local Area Administrators and the Statewide Grants Administrator must ensure that all records are maintained for the appropriate time frame. The following recommendations from SWIAD and the Internal Audit and Review Department are based on information gathered during the first year of data validation.

For Case Files of WIA Registered Participants

1. WIA hard copy case files should be filed as inactive cases by Exit Year as soon as all follow-up has been completed. See the above chart for these dates.

2. These case files, file drawers and/or boxes should be clearly marked with the appropriate destroy date.
3. Each participant should have only one hard copy case file per APPID number. If separate files for eligibility determination, program case management, and/or follow-up are maintained, we recommend that these files be combined prior to being filed in the inactive cases. [If exited individuals reapply for WIA, a new WIA Application must be entered into VOS, and this will create a new APPID Number. This would require you to create a new hard copy case file.] The APPID Number should be written on the outside of the hard copy case file to prevent any confusion during monitoring and/or data validation.
4. There should be a standard order for documents in the hard copy case files.
5. Inactive cases will be maintained by the service providers unless other arrangements are made with the Administrative Entity. The hard copy case file and records must be available on short notice (1 to 2 days) for monitoring, data validation, and audit purposes.
6. To reduce storage costs, you should file the **minimum** number of documents in the hard copy case file as specified in the VOS Procedures Manual, Section 1, Page 12. The individual's official case file is the electronic VOS file. The hard copy case file is required to contain any form that requires the participant's signature, all verification documents required by VOS, and any other required documents that are not contained in VOS. However, many of the case files that were reviewed contained copies of all VOS screens, all VOS Case Notes, etc. In moving to an electronic system, we should be reducing the amount of paper in the case files.

For Case Files of WIA Applicants Who Were Never Enrolled

Hard copy case files for WIA applicants who have complete applications but were not enrolled within 90 days of the eligibility determination or were determined ineligible for WIA services must be maintained for **three years past the Eligibility Date**.

For Case Files of Individuals with a Partial WIA Application

Hard copy case files for individuals with a partial WIA application must be maintained for **three years past the Application Date**.

INQUIRIES:

If you have any questions or comments, please call Mary Ann McDow or Robert Barber at 327-9041.

Robert A. Barber
SDA Administrator