

Record Retention Policy

Purpose:

This policy provides guidance for the retention and disposal of NWPA Job Connect documents, both paper and electronic forms.

Background:

Grantees, subrecipients, and contractors funded under the Workforce Innovation and Opportunity Act (WIOA) must abide by WIOA law, regulations, and guidance, state and local policies. This policy applies to financial, programmatic, supporting, statistical, and other records of grantees and sub-grantees. Records are required to be maintained by the terms of program regulations or grant agreements.

Audience:

- NWPA Job Connect staff
- Title I Provider
- TANF Youth Provider
- EARN Provider

Definitions:

Record- Any documentation, whether paper, electronic, or other format, that provides evidence of program administration, participant eligibility, services, outcomes, and fiscal responsibility.

Retention Period- The minimum required timeframe during which records must be preserved and remain accessible for review, audit, or litigation.

Program Year- The 12-month period beginning July 1 and ending June 30 used for WIOA program reporting and record retention timelines.

Grantee- The direct recipient of federal or state funds under WIOA, TANF Youth, or EARN who is legally responsible for compliance.

Subrecipient- An entity receiving funds from the grantee to carry out part of the program (e.g., local providers and partners)

EARN Program- Pennsylvania's TANF-funded initiative designed to assist individuals with barriers to employment through education, training, job readiness, and job retention services.

TANF Youth Development Program- A PA DHS-funded initiative using TANF dollars to support youth with career readiness, academic support, and employment opportunities.

Litigation Hold- A legal requirement to preserve all records relevant to ongoing or anticipated litigation beyond the standard retention period.

Policy:

1. The grantee must maintain adequate records relating to performance under the grant. NWPA Job Connect (NWPA Workforce Development Board) and the Commonwealth must have access to all records directly related to the administration of the grant for monitoring, audits, examination, excerpts, and transcriptions. Records include books, documents, and papers.
 - a. Records must be maintained for not less than three (3) years after the close of the applicable program year (PY).
2. If, prior to the expiration of the three (3) year retention period, any litigation is begun or a claim is instituted involving the grant covered by the records, the grantee must retain the records beyond the three (3) year period until litigation or claim is fully resolved.
3. Grantee will retain statistical records required by NWPA Job Connect and the Commonwealth and to produce statistical data when requested and provided on forms prescribed by NWPA Job Connect and/or the Commonwealth.
4. Records must be retained and stored in a manner that will preserve their integrity and other proceedings. The burden of production and authentication of the records is placed on the custodian of the records.
5. Records related to non-discrimination and equal opportunity provisions of WIOA must be retained for a period of not less than three (3) years from the close of the applicable PY.
 - a. Records of applicants, registrants, eligible applicants/registrants, participants, exiters, employees, and applicants for employment; and
 - b. Such other records as are required under part 29 CFR 37.39.
6. Records regarding complaints and actions taken on the complaints must be maintained for a period of not less than three (3) years from the date of resolution of the complaint.
7. TANF Youth Development Participant Records must be retained for a period of six (6) years or three (3) years past the period of performance end date.

Note**All documentation must be kept and made available for monitoring purposes. If documents are stored electronically, they must be made available and be legible.

REFERENCE

WIOA Section 185

2 CFR Part 200

29 CFR 97.42

20 CFR 683.150 (h)(5)

Temporary Assistance for Needy Families (TANF) Youth Development Program (YDP)
Desk Guide

Financial Management Guide Pennsylvania Department of Labor & Industry

HISTORY

Name	Date	Rev. Level	Description of change	Effective Date
Susan Richmond	4/7/2026	A	New format & policy number	07/10/2026

Recissions: NWPA Job Connect Policy #303 Record Retention Policy

Appendix A

INSTITUTIONAL AND LEGAL RECORDS		
Articles of Incorporation		Permanent
Charter		Permanent
By-Laws		Permanent
Minutes of Board Meetings		Permanent
Minutes of Committee Meetings		Permanent
Deeds and Titles		Permanent
Attorney Opinion Letters (Property)		3 years
Leases		While active + 3 years*
Policy Statements		3 years
Contract and Agreements		While active + 3 years*
EMPLOYMENT		
Job Announcements and Advertisements		3 years
<i>Individual Applicants Who Are Not Hired</i>		
Employment Applications		30 days
Background Investigation Results		30 days
Resumes		30 days
Letters of Recommendation		30 days
<i>Individual Applicants Who Are Hires</i>		
Employment Applications		While Active + 3 year*
Background Investigation Results		While Active + 3 year*
Resumes		While Active + 3 year*
Medical Examinations		While Active + 3 year*
Letters of Recommendation		While Active + 3 years*
Education records		While Active + 3 years*
Performance Evaluations		While Active + 3 years*
Disciplinary Records		While Active + 3 years*
PAYROLL RECORDS		
Wage or Salary History		7 years
Payroll Deductions		7 years
Time Cards or Sheets		3 years
W-2 Form		7 years
W-4 Form		7 years
Garnishments		While Active + 3 years*
Payroll Register		7 years
I9		While Active + 3 years*
MEDICAL, HEALTH AND SAFETY RECORDS		
Accident Reports		7 years
Safety Records		7 years
Employee Medical Complaints		7 years
Employee Injury Records		7 years
BENEFIT RECORDS		
Individual Employee Files		Life of Employee + 3 years
Pension Plans (after expiration)		7 years

FEDERAL TAX RECORDS		
Form 990 and Support		Permanent
Single Audit Reports		Permanent
REVENUE RECORDS		
Accounts Receivable		7 years
Accounts Receivable Ledgers		7 years
A/R Fiscal Year End Report		7 years
Receipts		7 years
Uncollected Accounts		While Active + 7 years*
ACCOUNTS PAYABLE RECORDS		
Accounts Payable Vendor Files		7 years
Processed/Paid Purchase Orders		7 years
Original		7 years
Expense Reports		7 years
Accounts Payable Reports		7 years
A/P Check Registers		7 years
BANK RECORDS		
Wire Transfer Records		7 years
Bank Statements		7 years
Deposit Records		7 years
Bank Reconciliations & Support		7 years
Canceled Checks		3 years
CAPITAL PROPERTY RECORDS		
Property Records		While Active + 3 years*
Inventory		While Active + 3 years*
Depreciation Schedules		While Active + 7 years*
Mortgage, Bonds and Other Long-Term Debt Records		While Active + 7 years*
Property Improvement Records		While Active + 7 years*
Property Tax Exemption Records		Life of Property + 7 years
FINANCIAL RECORDS		
Description of Accounting System		While Active + 3 years*
General Ledgers and Operating Ledgers		While Active + 7 years*
Journal Vouchers and backup (including budget entries)		While Active + 7 years*
Account Reconciliations		While Active + 7 years*
Annual Financial Report (audited)		Permanent
Audit Reports and Work Papers		While Active + 7 years*
Unclaimed Property Records		Life of Property + 3 years
BUDGET RECORDS		
Budget records		3 years
FACILITIES RECORDS		
Building Permits		While Active + 3 years*
Building Plans and Specifications		Permanent
Office Layouts		3 years
Zoning Permits		While Active + 3 years*
Operating Permits		While Active + 3 years*
Maintenance Records		While Active + 3 years*
Motor Vehicle Records		While Active + 3 years*
LITIGATION RECORDS		

Claims		While Active + 3 years*
Court Documents and Records		While Active + 3 years*
Deposition Transcripts		While Active + 3 years*
Discovery Materials		While Active + 3 years*
Litigation Files		While Active + 3 years*
INSURANCE RECORDS		
Property Insurance Policies		Life of the Property
Liability Insurance Policies		Life of the Policy + 3 years
Insurance Claim Documents		Settlement + 3 years