

**PEE DEE LWIA INSTRUCTION NUMBER:**

**WIA 12-006**

**TO:** Pee Dee Workforce Investment Area Grantees

**SUBJECT:** Record Retention and Storage

**ISSUANCE DATE:** December 18, 2012

**EFFECTIVE DATE:** Immediately

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**Purpose:** To transmit revised procedures for the storage and retention of Workforce Investment Act participant files to comply with data validation directives from the US Department of Labor. ***This instruction supersedes Pee Dee Local Workforce Investment Area Instruction #04-016.***

**Background:** On July 15, 2005, the Pee Dee Local Workforce Investment Area issued a records retention policy outlining procedures for maintenance of participant files for a time period sufficient to cover data validation and audits. Hard copy case files, including WIA eligibility case files, for all participants who exit between April 1 and March 31 must be maintained for five years

In order to comply with file maintenance requirements, the LWIA also adopted a policy of maintaining a single hard copy case file per SCWOS application identification number.

**Action Required:** ***For ease of monitoring and data validation, certification/eligibility staff will continue to transfer the entire certification folder to the intensive services provider at the time of WIA registration.*** Archived participant files should be boxed and stored by Program Year which includes exits that occur between April 1 and March 31.

**Case Files of WIA Registered Participants**

1. WIA hard copy case files should be filed as archived cases by Exit Year as soon as all follow-up has been completed.
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. ***Separate files for eligibility determination, program case management, must be combined at registration and maintained through participant follow-up.*** In order to ensure accountability for forms transferred between grantees, a file transfer form should be completed and signed by the certification grantee, who will release certification documents to the intensive services provider. The intensive services provider must, in turn, sign the form documenting receipt of all required certification documentation. It is the responsibility of the intensive services grantee to ensure that the proper documents are transmitted for placement in the participants' files. The intensive services provider must not accept incomplete certification files, since the grantee will be liable for any missing documentation.

The Youth service providers will follow the same guidelines as the intensive services provider with the exception of the file transfer form, which is not required for youth.

4. If exited individuals reapply for WIA, a new WIA Application must be entered into SCWOS, and this will create a new APPID number and require a new hard copy case file. The APPID number should be written on the outside of hard copy case files to prevent any confusion during monitoring and/or data validation.
5. There should be a standard order for documents in hard copy case files.
6. Inactive cases will be filed in a central location within the local area. The Pee Dee LWIA has elected to use American Specialty Office Supply for storage of all its archived records. This will facilitate retrieval of records on short notice (1 to 2 days) for monitoring, data validation, and audit purposes. A list of participant files along with the original New Box Input Form must be submitted to the attention of Tracey Washington as a compilation of records which have been released to the LWIA for storage at American Specialty. The grantee should maintain a copy of the participant list and the New Box Input Form for their records. The retrieval of records previously stored must also be requested in writing. When the records are returned, a LWIA representative will acknowledge receipt of the returned record(s) by indicating the return on the written request. The grantees are required to purchase the appropriate boxes (i.e. 1 cube banker box) from the WIA office supplies line item of their budgets, but the cost of storing the records off-site will be borne by the LWIA. At the time that a request for storing of records is being made, appropriate arrangements will be made regarding how records will be transported from the grantee's office to the COG and/or American Specialty.
7. To reduce storage costs, we ask that each grantee file the minimum number of documents in the hard copy case file as specified in the attached ***Participant File Required Hard Copy Documentation Form***. The individual's official case file is the electronic SCWOS file. The hard copy case file is required to contain any form that requires the participant's signature, all verification

documents required by SCWOS, and any other required documents that are not contained in SCWOS. It is not necessary to maintain copies of all SCWOS screens, SCWOS case notes, etc. By moving to an electronic system, we should be reducing the amount of paper in the case files.

8. In order to keep storage procedures simple and easy for our storage provider, the LWIA asks that the grantee complete the New Box Input Form and both ends of the banker storage boxes according to the attached samples.

What should be noted on the box end?

1. Box Number
  2. Beginning and Ending Exit Dates for the Program Year
  3. Destroy Dates
  4. Contents of Box
  5. Grantee Name and Workforce Center (if applicable)
9. A list of participant files included in the box should be securely attached to the outside top of the banker boxes.

#### **For Case Files of WIA Applicants Who Were Never Enrolled**

Hard copy case files for WIA applicants who have completed applications but were not enrolled within 90 days of eligibility determination or were determined ineligible for WIA services must be maintained for **three years past the eligibility determination date**. At the conclusion of each program year, these files will be properly boxed, labeled, and forwarded to the LWIA for storage at the facility leased for this purpose.

#### **For Case Files of WIA Applicants with a Partial WIA Application**

Hard copy case files for individuals with partial WIA applications must be maintained for **three years past the application date**. At the conclusion of each program year, these files will be properly boxed, labeled, and forwarded to the LWIA for storage at the facility leased for this purpose.

  
Joette R. Dukes  
Workforce Development Director

**Pee Dee Local Workforce Investment Area  
File Transfer Form**

Customer's Name \_\_\_\_\_ Last 4 Digits SS# \_\_\_\_\_

Eligibility Determination Date \_\_\_\_\_

Check One:      Adult \_\_\_\_\_ Dislocated Worker \_\_\_\_\_ Youth \_\_\_\_\_

<b><u>Form/Document (Where allowable, self-attestation should be used only by exception. In all cases, attempts to gather required documents and a signed statement of self-attestation must be documented.) * Documentation must be in file.</u></b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Signed SCWOS WIA Application			
Supplemental Information Sheet			
Participant Rights Handout			
Receipt of Information (RI-1)			
Authorization for Release of Information			
ESC UI Wage Inquiry (as applicable)			
Declaration of Unemployment Page (as applicable)			
<b><u>Citizenship/Alien Status</u></b> (I-9 list A, one item each from I-9 list B and C)			
<b><u>Verification of Social Security Number</u></b> (Staff viewing of: Social Security Card, DD-214 Report of Transfer or Discharge, Employment Records, IRS Form Letter 1722, Letter from Social Service Agency, Pay Stub, Social Security Benefits, W-2 Form)			
<b><u>*Verification of Date of Birth</u></b> (Driver's License, government-issued identification card, birth certificate, public assistance/social service records, DD-214, hospital birth record, passport, school records/identification, work permit if date of birth is shown, Baptismal Record with date of birth, public assistance/social service record, cross-match with Department of Vital Statistics, Tribal Record with date of birth, employer record)			
<b><u>*Verification of Address</u></b> (voter registration card, computer printout from government agency, driver's license, food stamp award letter, homeless-primary nighttime residence, housing authority verification, insurance policy (residence and auto), landlord statements, lease, letter from school or social service agency, library card, Medicaid/Medicare card, phone directory, property tax record, postmarked mail addressed to applicant, public assistance records, rent receipt, school identification card, selective service registration card, utility bill, applicant statement with corroborating witness)			
<b><u>*Verification of Selective Service Registration</u></b> (screen printout from the Selective Service Verification website at <a href="http://www.sss.gov">www.sss.gov</a> , Selective Service Registration Card, stamped post office receipt of registration, Form DD-214 "Report of Separation", LWIA waiver with supporting documentation as shown in Pee Dee LWIA Instruction 11-014)			
<b><u>*Verification of Veteran Status</u></b> (DD-214 Report of Separation)			
<b><u>*Highest Grade Completed</u></b> (copy of diploma, GED or degree, school records, school verification, self-attestation if no other documentation available)			
<b><u>*Employment Status</u></b> (UI Records, pay stubs, employer statement/contact, bank statements (direct deposit), farm or business financial records, Notice of Termination/Separation, self-attestation)			
<b><u>*Dislocated Worker Verification</u></b> (Cat. 1 or 2 -- Separation notice <u>and</u> UI records <u>and</u> no work available in occupation/industry in the area <u>or</u> UI profiled > 40% <u>or</u> if work is available in occupation/industry proof of work search) (Cat. 3 -- WARN notice or letter of authorization from State WIA Administrative Department <u>or</u> closure listed on the Layoff & Closure Report in SCWOS <u>or</u> layoff labeled "Substantial" on the Layoff & Closure Report in SCWOS (the individual's layoff date must be within 30 days of the Layoff Date on the report and "Substantial" must be "Yes") (Cat. 4 -- Documentation of general announcement) (Cat. 5 -- Receipt of notice of foreclosure or intent to foreclose, proof of failure of the farm, business or ranch to return a profit during the preceding 12 months, entry of individual into bankruptcy proceedings, proof of inability to make payments of loans secured by tangible business assets, inability to obtain capital necessary to continue operations, a debt-to-asset ratio sufficiently high to be indicative of the likely insolvency of the farm, ranch or business, other events indicative of the likely insolvency of the farm, ranch or business) (Cat. 6 -- Category 6 is verified in the <i>Displaced Homemaker</i> barrier)			

<b>*Displaced Homemaker</b> (public assistance records, court records, divorce papers, bank records, spouse's layoff notice, spouse's death record)			
<b>Disability Verification – (Must be kept in a locked file)</b> (letter from drug or alcohol rehabilitation agency, medical records, social service records/referral, physician's statement, psychiatrist's statement, psychologist's diagnosis, rehabilitation evaluation, school records, sheltered workshop certification, worker's compensation record, social security administration disability records, veterans administration letter/records, vocational rehabilitation letter)			
<b>*Verification of Family Size</b> (Public assistance/social service agency records, birth certificate(s), decree of court, proof of disability if applicable, divorce decree, marriage certificate/license, most recent tax return supported by IRS documents (e.g. form letter 1722), public housing authority records if resident or on waiting list, written statement from a publicly-supported 24-hour care facility or institution, corroboration of third party who knows the family – signed and in file)			
<b>*Verification of Family Income</b> (pay stubs for previous 6 months (can use year-to-date on one pay stub if it shows at least 6 months), alimony agreement, UI documents/printout, award letter from Veterans Administration, bank statements showing direct deposits for previous 6 months, compensation award letter, court award letter, employer statement/contact, farm or business financial records, housing authority verification, pension/annuity statement, public assistance records, quarterly estimated tax for self-employed persons, Social Security benefits)			
<b>*Supplemental Security Income (SSI)</b> (public assistance records/printout listing applicant as SSI recipient, copy of authorization to receive cash public assistance (SSI), copy of public assistance check, medical card showing cash grant status, medical card showing cash grant status, refugee assistance records)			
<b>*TANF Verification</b> (public assistance records/printout listing applicant in TANF budget, copy of authorization to receive public assistance, copy of public assistance check)			
<b>*Food Stamp Assistance Verification</b> (current authorization to obtain food stamps, public assistance records/printout showing applicant in food stamp budget)			
<b>*LWIA Adult Priority for Services</b> (documentation that supports Pee Dee LWIA Priority for Services definition)			
<b>Youth Only (Documentation other than self-attestation MUST be provided for at least one youth barrier.)</b>			
<b>School Status</b> (copy of diploma, GED or degree, school records, attendance, drop-out letter, self-attestation)			
<b>Foster Care (Low Income)</b> (statement/referral from social services agency, foster care facility resident document, court/guardianship documents, phone call to DSS documented in case notes)			
<b>Homeless/Runaway Verification</b> (written statement from shelter, written statement from individual providing temporary assistance, written statement from social service agency, self-attestation)			
<b>Offender</b> (police records, court documents, letter of parole, letter from probation office, telephone call with court representative documented in case notes, Department of Corrections website/records, self-attestation)			
<b>Basic Literacy Skills Deficiency for Youth</b> (Copy of generally accepted standardized assessment test, school record of reading and/or math skills determined with the previous 6 month of application)			
<b>Parenting Youth Verification</b> (physician's statement, child's birth certificate, hospital record of birth, self-attestation)			
<b>Foster Child</b> (written statement from state social services agency, phone call to DSS documented in case notes, social services agency record/printout, *self-attestation)			
<b>Youth Requires Additional Assistance</b> (documentation from parents, counselors, teachers, or other school officials; documentation from an LEA-approved alternative secondary curriculum or program; standardized test scores; results from assessment of pre-employment work maturity skills, self-attestation)			

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

FILE TRANSFERRED FROM: \_\_\_\_\_

Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_

FILE TRANSFERRED TO: \_\_\_\_\_

Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_



# **PARTICIPANT FILE REQUIRED HARD COPY DOCUMENTATION**

## **Eligibility Determination/Certification Documentation**

- WIA Application signed and dated by certification staff person and applicant (parent or guardian signature also required for applicants less than 18 years of age).
- Eligibility verification documentation for the following (Please refer to the File Transfer Form and the most recently transmitted Data Element Validation Guide for acceptable verification documentation sources):

Citizenship/Alien Status	Verification of Social Security Number
Date of Birth	Address/Residency
Selective Service Registration (Males)	Veteran Status
Family Size	Family Income
Disability (Separate Locked File)	Employment Status
Dislocated Worker Verification	Highest Grade Completed in School
School Status (Youth)	Foster Care (For Low Income)
Youth Barriers (Documentation other than self-attestation must be provided for at least one barrier)	
Receipt of Public Assistance (TANF, Food Stamps, Supplemental Security Income [SSI], Foster Care Payments, Refugee Cash Assistance)	

## **Other Required Documentation**

- Participant Rights/Grievance Procedures signed and dated by the applicant and appropriate staff
- Receipt of Information signed and dated by the applicant and staff
- Release of Information Form signed and dated by the applicant
- Individual Employment Plan (IEP)
- Time/Attendance Records
- Receipts, Invoices, etc.
- Individual Training Account Documentation
- Hold Status Documentation (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Excluded exit reasons (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Credential/Degree Attainment
- Follow-up/Performance Attainment Documentation (youth attainment of degree/certification, youth literacy/numeracy EFL gains as documented by post-test scores, youth placement in employment, education or military, adult/DW supplemental documentation of employment if not covered under UI Wage Records)
- Other documentation requiring verification as stipulated in State or LWIA policies/procedures

**Items that may be documented by SCWOS case notes, activity records, etc. are not required to be included in the hard copy file (i.e. case notes, activity records, etc. need not be printed and placed in participants' hard copy files).**

# Sample

## NEW BOX INPUT FORM

Please fill out for each new box being placed into storage.

Records Managers  
2109 W. Darlington St.  
Florence, SC 29501  
843/664-1114  
Fax: 843/664-4362

COMPANY NAME: Pee Dee Regional Council of Governments	
DEPARTMENT NAME: Grantee Name (Workforce Center if applicable)	
BOX NUMBER: 10	BOX CONTENTS: Exited Participant Files
FROM DATE: April 1, 2012	TO DATE: March 31, 2013
DESTROY DATE: March 31, 2018	RECORD TITLE:
BOX LOCATION:	BOX SIZE:
DATE BOX RECEIVED:	
ADDITIONAL BOX INFORMATION: Program Year 2012 Exited Participant Files	

AUTHORIZED CO. REP. Signature DATE \_\_\_\_\_

AUTHORIZED RM. REP. \_\_\_\_\_ DATE \_\_\_\_\_

☐ RECORDS MANAGERS USE ONLY

FILE NUMBER

## FILE DESCRIPTION

[illegible]

Sample

Box No.  
N° de boîte

10

Box Location  
Emplacement de la boîte

Destroy Date  
Date de destruction

3-3-18

From  
Du

4-1-12

To  
Au

3-31-13

Contents  
Contenu

Grantee Name (Workforce Center)

Exited Participant Files

33250 PY2012