

**GLOW WORKFORCE DEVELOPMENT BOARD POLICY
UNDER THE WORKFORCE INNOVATION OPPORTUNITY ACT (WIOA)**

NAME OF POLICY: Case File Maintenance Policy

APPROVAL DATE: January 15, 2019

EFFECTIVE DATE: January 15, 2019

Policy: The GLOW WDB has developed this policy to provide guidance to service providers on when and how to enter data into the OSOS system, as well as what documentation needs to be retained in the participant files. Data entered correctly and within the required timeframe will benefit GLOW with consistency between providers, a training tool for new staff, and decreased likelihood of findings and observations in GLOW WDB, NYSDOL and USDOL reviews.

Procedure:

OSOS data: Upon completion of an eligibility Intake into a WIOA Adult, DLW, or Youth program, staff will enter the required data into the OSOS system. Every attempt to enter the data the day it is collected should be made, however staff must have data entered within five days of service provision. **TA 11-12.**

Staff will refrain from using customer SSN, DOB in a case note in any of the comment sections of OSOS as this information is gathered in other areas of OSOS. Staff is permitted to enter full addresses into a case note as this may assist in the location of the customer during active and follow-up periods.

Staff will complete within the allowable time frame all required areas of OSOS including Customer Detail, Comprehensive Assessment, and Services Tabs. For assistance regarding the proper method of OSOS documentation go to <https://labor.ny.gov/workforcenypartners/osos.shtm>

Customer files: Rights of timely and reasonable access to records must be granted to USDOL, the Comptroller General of the United States, NYSDOL, Grant Recipients, Fiscal Agents or any of their authorized representatives to make audits, examinations, excerpts and transcripts as they deem necessary. This right also includes timely and reasonable access to a recipient's personnel for the purpose of interview and discussion related to such documents. **TA16-2**

The use of correction fluid makes it impossible to see what was previously written. Pencil can be altered. Therefore neither of these meets the requirement of ensuring that "the method used ensures that the security safeguards and protections are sufficient for the records to be accepted by a court as evidence." If an error on customer records should occur cross out errors with a single line and initial

Attachment A: WIOA File checklist Youth- A copy of this attachment must be maintained in the Youth file.

Attachment B: WIOA File Checklist Adult/DLW- A copy of this attachment must be maintained in the Adult/DLW file.

File Security: Participant files both electronically and paper must be kept in secure locations. GLOW has developed a Personally Identifiable Information (PII) and Personal, Private and Sensitive Information (PPSI) Policy that addresses the process by which these files are to be stored. Service Providers and staff should be familiar with this policy to ensure all information is secure. This includes keeping the files in a

central location so authorized staff are able to access files if the current case manager is not available. All WIOA files will be returned to the staff of the GLOW WDB in the event that the contract has ended and the service provider no longer is a sub recipient of GLOW.

In accordance with Federal requirements, all records (e.g., financial/expenditure records, supporting documents, statistical records, other non-Federal entity records, pertinent books, papers or other records of grant recipients and sub-recipients) pertinent to a Federal award administered by NYSDOL, must be retained by the custodian of the records for a period of three (3) years from the date of submission of the final expenditure report by NYSDOL to the United States Department of Labor (USDOL). The custodian of the records is the person who is tasked with taking care of records, whether physical or electronic in nature.

Examples of Federal awards subject to record retention requirements include: Workforce Investment Act (WIA), Workforce Innovation and Opportunity Act (WIOA), Trade Adjustment Assistance (TAA) and all other pass-through funds (i.e., funds issued by USDOL to NYSDOL that are then transferred to LWDAs).

LWDBs, local area grant recipients, sub-recipients, and any other entities (e.g., fiscal agents, discretionary grantees, Eligible Training Providers) receiving any of the funds mentioned above must retain all records, until the required Record Retention Period has been met. In addition, records for real property and equipment acquired with Federal funds shall be retained for three (3) years after final disposition of the real property or equipment.

ADDITIONAL INFORMATION

Calculation of three-year Record Retention Period:

The three (3) year Record Retention Period begins on the date final expenditure reports are submitted by NYSDOL to USDOL. Should any audit or litigation issues arise, the records must be retained for the full three (3) year Record Retention Period or until all issues are resolved, whichever is longer. **TA-16-2**