

7.A **Revision of Records Maintenance, Retention and Disposal – C-301 Policy** (Action)

At the March 14, 2007 Finance Committee meeting, staff reported that two policies (Suspected Misconduct and Dishonesty – Policy B-512 and Records Maintenance, Retention and Disposal – Policy C-301) had been reviewed for compliance with the Sarbanes-Oxley Act as recommended by the audit firm Wegner LLP.

In response to a question, administration reviewed whether “date of birth” should be included as information not to be disclosed and report back to the Committee.

Since the March Finance Committee meeting, the Department of Workforce Development (DWD) has amended its policy requiring that all program participant files must be retained for seven (7) consecutive years after the participant exits from U.S. DOL funded programs. SWWDB Policy C-301 currently states that all records shall be retained for a period not less than three (3) years from the ending date of the grant.

Management recommends that the current Records Maintenance, Retention and Disposal – Policy C-301 be updated to include “date of birth” and that it mirror the requirement(s) of the retention of records in the Division of Employment and Training Workforce Investment Act (WIA) Program Guide. **Attachment 1** reflects the recommended changes.

The Finance Committee will meet prior to the Board meeting to review the suggested changes. Pending the approval of the Finance Committee, it is recommended that the Board action to approve the changes to Records Maintenance, Retention and Disposal – Policy C-301.