



Workforce Innovation & Opportunity Act Policy

Record Retention Policy

Effective Date: 10/23/2025

Record Retention Policy CWMWDB

PURPOSE:

This policy sets forth the minimum record retention requirements for the Central Western Maine Workforce Development Board and its subrecipients.

BACKGROUND:

CWMWDB and its subrecipients are required to maintain and retain records of all fiscal and programmatic activities funded with federal and state grants. Recipients must keep records that are sufficient to permit the preparation of reports required by the funder (when applicable) and the tracing of funds to a level of expenditure adequate to ensure the funds have been spent lawfully. According to 2 CFR 200.334, the federal government requires recipients and subrecipients to retain all Federal award records for three years from the date of submission of their final financial report. In the Maine Department of Labor's Financial Manual revised 1-9-25, all records must be retained for three years following the date on which the expenditures report containing the final expenditures charged to a grant is submitted by the State to *its* awarding agency. However, the IRS requires employers to maintain copies of payroll records for four years, and many accountants, lawyers and insurance experts recommend keeping all records for seven years to be conservative (with the exception of those that are recommended to be kept permanently).

POLICY:

It is the policy of the CWMWDB to retain all records for seven years after submittal of the final expenditure report (closeout) for that funding period to the awarding agency. Since storage of records is now done electronically and does not have the same physical space requirements as it has historically, the period of seven years poses no hardship. Records include:

- All records pertinent to grants, grant agreements, interagency agreements, contracts, or any other award, including financial, statistical, property, and supporting documentation.
- Records for real and non-expendable property and equipment.
- Records regarding complaints and actions taken on the complaints from the date of resolution of the complaint.
- Employees and applicants for employment after the end of the fiscal year.

The following list of items will be retained permanently:

- Audit reports
- Any contract, deed, mortgage, note or lease currently in effect
- Fixed asset purchase, depreciation, and disposal records
- Insurance policies and claims
- Organizational documents (articles of incorporation, meeting minutes)
- Retirement and pension records
- All records retained beyond the mandatory retention period are subject to audit and/or review.

CWMWDB follows the state policy regarding all participant data, as MDOL is the repository of participant data through its case management system, the Maine Job Link. This is a period of seven years and includes all program and data validation records pertinent to applicants, registrants, eligible applicants/registrants, participants, and terminees,

REFERENCES:

- 2 CFR Part 200.334