

**SOUTHWESTERN AREA
WORKFORCE DEVELOPMENT BOARD**

**ELECTRONIC FILES CONTENT & RECORDS RETENTION MANAGEMENT
POLICY 17-19.1**

DATE OF ISSUE

February 10, 2020

EFFECTIVE DATE

February 17, 2020

APPLICABILITY

Southwestern Area Workforce Development Board and its sub-recipients

DATE OF ISSUE

To establish the local board policy regarding electronic file storage and imaging standards for workforce programs utilizing the New Mexico Workforce Connection Online System (NMWCOS).

ACTION

The State established a standard for an electronic file (e-file) which includes a paperless registration, eligibility determination, and program enrollment. Effective January 1, 2015, all new program enrollments are required to be completed in an e-file format. The results are a real-time environment for storing and viewing applicant verification and eligibility determination documents. Authorized personnel are required to scan, import, and save all verification documents at the time they are being reviewed during the application process in NMWCOS per distinct program requirements.

E-files for purposes of this policy and all programs related to this policy, refer to the comprehensive storage of participant files in an electronic format using the NMWCOS. The program application, related activities, case notes, and all other relevant individual/entity information are captured and stored solely in NMWCOS, the state integrated management information system, and all documentation and eligibility verifications specific to each applicant are scanned and stored in the Content Management System in the NMWCOS.

Content Management Access for all users shall be granted based on the users' security access profile.

Any and all pertinent documentation that is scanned is required to be legible in view and printed form. Illegible images must be removed and the document must be rescanned until a legible image has been captured.

The process of deleting an image that has already been saved to an applicant's electronic file can only be performed by the State or Local System Administrator. Scenarios requiring the deletion of images may include the following:

- A. Image was saved to an incorrect program applicant's file, or
- B. Image was saved under an incorrect document type

Documents scanned into the Content Management System are required to be scanned by case management staff. Uploaded documents must be processed, maintained, or discarded by case management staff to ensure the confidentiality of information and to safeguard against misuse.

Use of Content Management System in accordance with this policy provides opportunities for monitoring to be performed remotely. Information is readily available, and files are current due to the real-time entry of all documentation.

The State and Local Workforce Board are responsible for completing the full scope of monitoring as outlined in federal, state, and local policies including all elements of notification, reporting, entrance, and exit conferences and associated timelines. Transition to e-files and utilization of the content management system expands opportunity for remote monitoring as appropriate but does not eliminate any of the requirements for program administration and monitoring.

The Document Tag List attached is to be followed and no variation is to be made to this list.

RECORDS RETENTION

The purpose of the records retention section of this policy is to ensure that complete historical records are maintained and that overrides are restricted to an individual's record in the NMWCOS or in areas identified in 2 CFR 200.333.

The SAWDB will follow the federal regulations in 2 CFR§ 200.333 (a), (b) and (d).

2 CFR 200.333 (a), (b), and (d) state, "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

(a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

(b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.

(d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity"

Specific to participant records, service providers must ensure that:

- (a) The following participants' documents are signed & dated, scanned, and uploaded in the NMWCOS:
 - (1) Application
 - (2) Individual Employment Plan
 - (3) Objective Assessment Summary
 - (4) Credential

The above documents cannot be deleted only updated, resigned and scanned into NMWCOS. With the exception of a credential.

- (b) Case notes are an integral part of the participant's record and must include detailed accounts of the participant's progress in accordance with their plan.
- (c) Case note must be included prior to any changes made to the exit dates and activity codes.
- (d) Overrides must be case noted and will only be allowed on a case by case bases with a justification as long as exit dates are not affected in the NMWCOS.
- (e) As part of the SAWDB's monthly desk review and annual on-site monitoring of the service provider, the Administrative Entity will sample participant files for records retention and include its findings in the monitoring report that is submitted to the SAWDB's monitoring committee for review and action.

INQUIRIES

Questions related to this policy should be directed to the Administrative Entity at (575) 744-4857.

ATTESTED

This policy was reviewed and approved by the SAWDB

on: _____

SAWDB Chairman

Date