

**SOUTHWESTERN AREA  
WORKFORCE DEVELOPMENT BOARD**

**Electronic Files Content & Records Retention Management  
Policy 17-19.2**

**Effective Date**

August 14, 2025

**Applicability**

Southwestern Area Workforce Development Board and its sub-recipients.

**Purpose**

To establish the local board policy regarding electronic file storage and imaging standards for workforce programs utilizing the America's Job Center (NMJobs).

**Action**

The State established an electronic file (e-file) standard, including paperless registration, eligibility determination, and program enrollment. Effective January 1, 2015, all new program enrollments must be completed in an e-file format. The result is 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 when they are being reviewed during the application process in NMJobs per distinct program requirements.

E-files for this policy and all related programs refer to the comprehensive storage of participant files in an electronic format using NMJobs. The program application, associated activities, case notes, and all other relevant individual/entity information are captured and stored solely in NMJobs, 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 on NMJobs.

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

Any scanned pertinent documentation must 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. The image was saved to an incorrect program applicant's file, or
- B. The image was saved under an incorrect document type

Case management staff must scan documents into the Content Management System and process, maintain, or discard uploaded documents to ensure confidentiality of information and safeguard against misuse.

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

The State and Local Workforce Board is 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 is to be followed, and no variation will be made to this list unless approved by the AE.

### **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 NMJobs 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.
- C. When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement does not apply 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 to NMJobs:
  - a. Application
  - b. Individual Employment Plan
  - c. Objective Assessment Summary
  - d. Credential

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

- B. Case notes are integral to the participant's record and must include detailed accounts of their progress per their plan.
  - C. Case notes must be included before the exit dates and activity codes are changed.
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- D. Overrides must be case noted and will only be allowed on a case-by-case basis with justification, as long as exit dates are not affected in the NMJobs.
- 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 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 August 14, 2025.

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SAWDB Chair