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Office of Compliance Issuance

12-2026

Release Number-Program Year

Active Date: 02/09/2026
Effective Date: 02/09/2026
Expiration Date: Continuous, until further notice

Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

Record Retention

ATTACHMENTS (if any):

(A)– Instructions: Retaining Records

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
Title I: Adult
Title I: Dislocated Worker
Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this policy is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

CFR § 200.334
OWD Issuance – Records Retention Policy

## **SUMMARY**

This policy communicates procedures for retaining records across programs administered by St. Louis County Workforce Development (STLCOWD).

## **BACKGROUND:**

This policy is based on CFR 200.334 and OWD Issuance - Records and Retention and expanded to cover additional requirements regarding retention of records.

## **SUBSTANCE:**

### **A. RECORDS RETENTION**

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 (3) 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:

1. 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.
2. 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.
3. Records for real property and equipment acquired with Federal funds must be retained for three (3) years after final disposition.
4. When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the three (3) year retention requirement is not applicable to the non-Federal entity.
5. Educational records (transcripts, certificates of completion, licenses, measurable skills gains, attendance records and other documents related to training activities) must be retained in perpetuity and cannot be disposed of after three (3) years records can be moved to a secure storage area and clearly marked as educational records and are not to be destroyed.

### **B. RECORDS DESTRUCTION**

Records which meet the criteria outlined above can be destroyed.

The Attachment to this Policy describes the forms needed to document which records are designated for destruction. The Attachment also describes procedures to follow when assigning records for destruction.

### **C. CUSTODY OF RECORDS**

To avoid duplicate recordkeeping, subrecipient(s) will retain records that are required for joint use. In the event STLCOWD identifies a need for such records, during the prescribed period of time, STLCOWD will have the right to transfer those records to its custody. When the records are transferred to or maintained by STLCOWD, the three-year retention requirement does not apply to the subrecipient that relinquished its records.

If any records are unintentionally disposed of through acts of man or God before the three-year period, STLCOWD must be notified immediately. STLCOWD must request written permission from OWD before any records are destroyed.

### **RESPONSIBILITIES**

Program Directors and Compliance Staff for each program will be responsible for implementation of this policy.

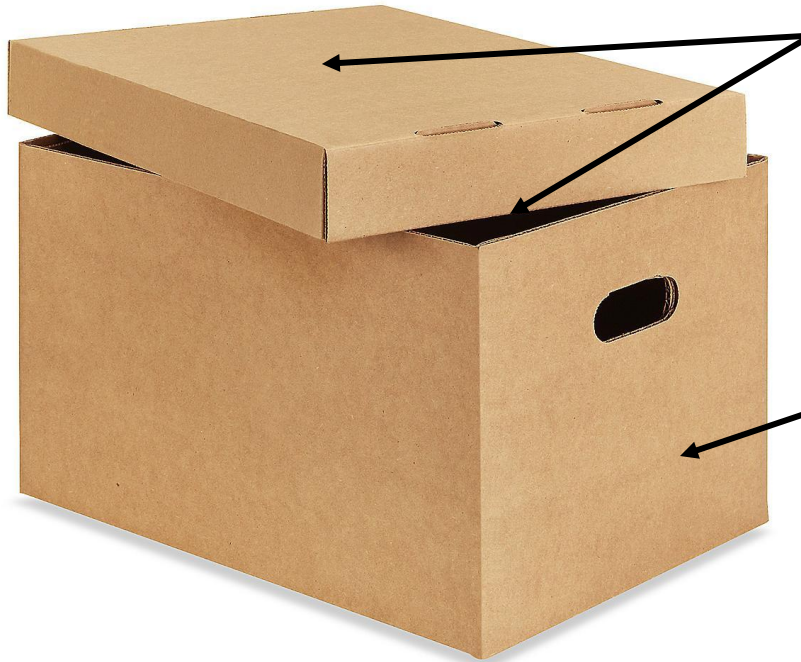
### **ACCOUNTABILITY**

Office of Compliance will review on yearly basis adherence to this policy.

### **INQUIRIES**

Please direct all questions or comments regarding this Issuance document to [complianceteam@fwca-stl.com](mailto:complianceteam@fwca-stl.com). All active, expired, or rescinded Issuances are available upon request.

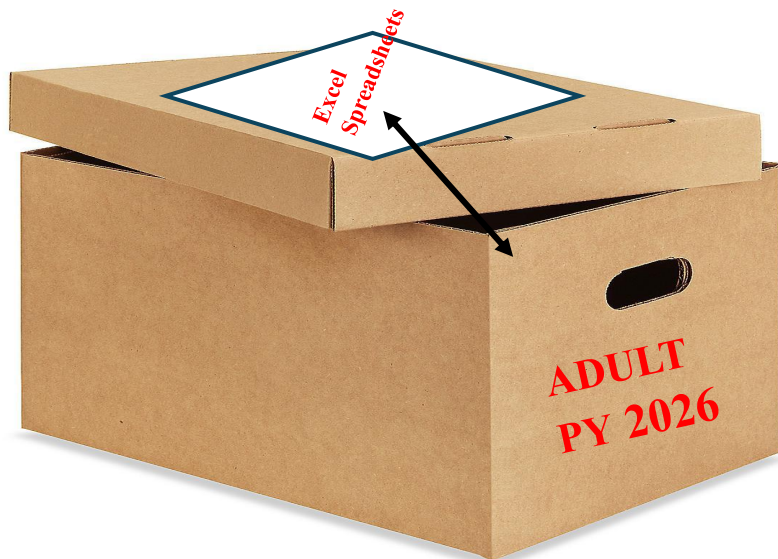




One Excel Spreadsheet is placed inside the box. One Excel Spreadsheet is taped to the lid of the box

Label the box with the appropriate Program Year and Program

**Diagram #2**



**Diagram #3 Example of the boxed file (Excel spreadsheet on the lid. Excel spreadsheet inside. Calendar Year on the outside of the box)**